

TSD File Inventory Index

Date: December 5, 2000

Initial: CMB/evan

Facility Name: <u>GMC (Fisher Body Division - One Fisher Site)</u>			
Facility Identification Number: <u>MID 005 356 787</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	Y	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)	Y
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement	Y
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	Y
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports	Y
.2 Closure/Post Closure Plans, Certificates, etc	Y	D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual folder per schedule.

**Public
Participation**

VERIFICATION OF RECEIPT OF PUBLIC REVIEW MATERIALS

NAME OF LIBRARY CONTACT, LIBRARY AND LOCATION:

Ms. Doris Detwiler, Chief
Sociology & Economic Department
Detroit Public Library
5201 Woodward Ave.
Detroit, MI 48202

(313)
833-1443

FACILITY NAME, LOCATION AND ID #:

GMC - Fisher Guide Fort Street Plant
MID005356787
6307 W. Fort St.
Detroit, MI 48209

MATERIALS RECEIVED:

Closure Plan
Public notice

DATE RECEIVED/MADE AVAILABLE TO PUBLIC: 5/3/85

SIGNATURE OF RECEIVING PARTY: Doris Detwiler

PLEASE RETURN (IN SELF-ADDRESSED, POSTAGE AND FEES PAID, ENVELOPE) TO:

U.S. Environmental Protection Agency
5HS-JCK-13
230 S. Dearborn Street
Chicago, IL 60604

Attention: Christine Klemme

RECEIVED
MAY 06 1985
SOLID WASTE BRANCH
U.S. EPA, REGION V

CONTACT Cbristine Klemme at (312) 886-3715

PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE U. S. Environmental Protection Agency, Solid Waste Branch		For Agency Use Only	
PLACE VOUCHER PREPARED 230 S. Dearborn, 5HS-JCK-13, Chicago, IL 60604		DATE PREPARED 4/29/85	VOUCHER NUMBER
NAME OF PUBLICATION The Detroit News		PAID BY <i>OK to new 5/7/85 2:30 p.m. per Ms. Sebastian</i>	
NAME OF PUBLISHER OR REPRESENTATIVE			
ADDRESS (Street, room number, city, State, and ZIP code) Ms. Sebastian, Classified's		6200 Metro Parkway Sterling Heights, MI 48077	

(313) 977-7500

CHARGES

TYPEFACE	(size of type)	POINT PER		(inch, square, word, or folio)
		NUMBER OR LINES (Indicate counted or space)	COST PER LINE	TOTAL COST
Line Rates		FIRST INSERTION	\$	\$
		ADDITIONAL INSERTIONS GIVE NUMBER ▶		
		TOTAL		\$
		NUMBER OF UNITS (Indicate inch, square, word, folio)	COST PER UNIT	TOTAL COST
Other Rates		FIRST INSERTION	\$	\$
		ADDITIONAL INSERTIONS GIVE NUMBER ▶		
		TOTAL		\$

Attach one copy of advertisement (including upper and lower rules) to each copy of voucher here. If copy is not available sign the following affidavit.

TOTAL LINE RATES AND OTHER RATES	
LESS DISCOUNT AT %	
BALANCE DUE	\$
VERIFIED (Initials)	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE

TITLE

DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN	DATE PUBLISHED
I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.	
SIGNATURE AND TITLE OF CERTIFYING OFFICER	DATE
SIGNATURE AND TITLE OF AUTHORIZING OFFICER	DATE
ACCOUNTING CLASSIFICATION Estimate with affidavit: \$500.00 <i>5A4E05\$002</i> <i>\$90091</i>	PAID BY CHECK NUMBER <i>6850200</i> <i>2540</i>

¹ If the ability to certify and authority to approve are combined in one person enter "N/A" (not applicable) here.

AM 5/2

ADVERTISING ORDER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

ORDER NUMBER

U.S. Environmental Protection Agency-Solid Waste Branch

DATE

4/29/85

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates

charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN

DETROIT NEWS

SUBJECT OF ADVERTISEMENT

Public Notice

EDITION OF PAPER ADVERTISEMENT APPEARED

Morning

NUMBER OF TIMES ADVERTISEMENT APPEARED

One time

DATE(S) ADVERTISEMENT APPEARED

Friday, May 10, 1985

SPECIFICATIONS FOR ADVERTISEMENT

Please place in legal, classified section of paper

COPY FOR ADVERTISEMENT

See attached sheet

AUTHORITY TO ADVERTISE		INSTRUMENT OF ASSIGNMENT	
NUMBER	551077NALT	NUMBER	
DATE	May 2, 1985	DATE	
SIGNATURE OF AUTHORIZING OFFICIAL	<i>Brigitte Marzke</i>	TITLE	

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC.
D.C. Bids are requested for first spring 1985 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5676-H, consisting of 13,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 8:00 p.m., November 15, 1985.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to

U.S. Environmental Protection Agency

230 S. Dearborn

Financial Operations Section

Chicago, IL 60604

IMPORTANT

Changes for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition listed in this order.

ENVIRONMENTAL
AGENCY

June 13, 1985

End of Comment Period for GMC-Fisher Guide Fort Street Plant

Christine Klemme

Lorna Jereza

The comment period for the closure of GMC-Fisher Guide Fort Street Plant, ID# MID005356787 closed on June 10, 1985.

NO comments were received.

PUBLIC NOTICE

The United States Environmental Protection Agency (U.S. EPA) has received a certification of change in status from General Motors Corporation-Fisher Guide Fort Street Plant (GMC), located at 6307 West Fort Street, Detroit, Michigan. GMC has stored hazardous waste (as defined by federal law) in containers. This action will change the status of GMC from a storage facility to that of a generator storing for fewer than 90 days (per 40 CFR 262.34). The change in status for this facility was effected by removing hazardous waste stored for longer than 90 days and by limiting the present accumulation period to fewer than 90 days.

The certification of change in status was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act, as amended. U.S. EPA required the certification of change in status when GMC requested a change in status from a storage facility to a small quantity generator.

The certification and related background materials are available to the public at the U.S. EPA, Solid Waste Branch, 230 South Dearborn Street, 13th Floor, Chicago, Illinois 60604, (312) 886-3715, from 8:30 a.m. to 4:30 p.m., Monday through Friday. These materials also may be seen during business hours in the Sociology and Economics Department of the Detroit Public Library, 5201 Woodward Avenue, Detroit, Michigan.

Public comments concerning this certification or this action are invited by U.S. EPA and will be accepted through June 10, 1985. Please send comments

to:

U.S. Environmental Protection Agency
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690-3587

ATTN: Christine Klemme



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

111 West Jackson Blvd. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF: RCRA ACTIVITIES

MAY 18 1982

Mr. Richard Chadbourne GMC Fisher Body Fort Street 6307 West Fort Street Detroit, Michigan 48209

RE: Interim Status Acknowledgement FACILITY NAME: GMC Fisher Body Fort Street

USEPA ID No. MID005356787

Dear Mr. Chadbourne:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely,

[Handwritten signature of Karl J. Klepitsch, Jr.]

Karl J. Klepitsch, Jr., Chief Waste Management Branch

6/11/82 RES

Enclosure cc: C. Katko

New Owner

sub

COPY

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only Form Approved OMB No. 2050-0028 Expires 10-31-97 GSA No. 0246-EPA-07

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

10586
United States Environmental Protection Agency

Date Received (For Official Use Only)
JUN 2 1991
U.S. EPA REGION V

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

A. First Notification B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number
MID985617182

II. Name of Installation (Include company and specific site name)

S Y B I L L I N C O R P O R A T E D

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street Not an address change, address update

1 4 0 D R A G O O N

Street (continued)

City or Town State ZIP Code

D E T R O I T M I 4 8 2 0 9 -

County Code County Name

163 W A Y N E

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

4 0 0 T O W N C E N T E R S U I T E 3 0 0

City or Town State ZIP Code

D E A R B O R N M I 4 8 1 2 6 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last) (first)

M A D I A S V A S I L I O S

Job Title Phone Number (area code and number)

P R E S I D E N T 3 1 3 - 3 3 6 - 7 7 5 0

VI. Installation Contact Address (See Instructions)

A. Contact Address Location Mailing B. Street or P.O. Box

4 0 0 T O W N C E N T E R S U I T E 3 0 0

City or Town State ZIP Code

D E A R B O R N M I 4 8 1 2 6 -

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

S Y B I L L I N C O R P O R A T E D

Street, P.O. Box, or Route Number

4 0 0 T O W N C E N T E R S U I T E 3 0 0

City or Town State ZIP Code

D E A R B O R N M I 4 8 1 2 6 -

Phone Number (area code and number) B. Land Type C. Owner Type D. Change of Owner Indicator (Date Changed) Month Day Year

3 1 3 - 3 3 6 - 7 7 5 0 P P Yes X No 0 1 0 5 9 1

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity	B. Used Oil Fuel Activities
<p>1. Generator (See Instructions) <input type="checkbox"/></p> <p style="margin-left: 20px;">a. Greater than 1000kg/mo (2,200 lbs.) <input type="checkbox"/></p> <p style="margin-left: 20px;">b. 100 to 1000 kg/mo (220 - 2,200 lbs.) <input type="checkbox"/></p> <p style="margin-left: 20px;">c. Less than 100 kg/mo (220 lbs.) <input type="checkbox"/></p> <p>2. Transporter (Indicate Mode in boxes 1-5 below) <input type="checkbox"/></p> <p style="margin-left: 20px;">a. For own waste only <input type="checkbox"/></p> <p style="margin-left: 20px;">b. For commercial purposes <input type="checkbox"/></p> <p style="margin-left: 20px;">Mode of Transportation</p> <p style="margin-left: 40px;"><input type="checkbox"/> 1. Air</p> <p style="margin-left: 40px;"><input type="checkbox"/> 2. Rail</p> <p style="margin-left: 40px;"><input type="checkbox"/> 3. Highway</p> <p style="margin-left: 40px;"><input type="checkbox"/> 4. Water</p> <p style="margin-left: 40px;"><input type="checkbox"/> 5. Other - specify </p>	<p>3. Treater, Storer, Disposer (at installation) <input type="checkbox"/> Note: A permit is required for this activity; see instructions.</p> <p>4. Hazardous Waste Fuel <input type="checkbox"/></p> <p style="margin-left: 20px;">a. Generator Marketing to Burner <input type="checkbox"/></p> <p style="margin-left: 20px;">b. Other Marketers <input type="checkbox"/></p> <p style="margin-left: 20px;">c. Burner - indicate device(s) - Type of Combustion Device <input type="checkbox"/></p> <p style="margin-left: 40px;">1. Utility Boiler <input type="checkbox"/></p> <p style="margin-left: 40px;">2. Industrial Boiler <input type="checkbox"/></p> <p style="margin-left: 40px;">3. Industrial Furnace <input type="checkbox"/></p> <p>5. Underground Injection Control <input type="checkbox"/></p>
	<p>1. Off-Specification Used Oil Fuel <input type="checkbox"/></p> <p style="margin-left: 20px;">a. Generator Marketing to Burner <input type="checkbox"/></p> <p style="margin-left: 20px;">b. Other Marketer <input checked="" type="checkbox"/></p> <p style="margin-left: 20px;">c. Burner - indicate device(s) - Type of Combustion Device <input type="checkbox"/></p> <p style="margin-left: 40px;">1. Utility Boiler <input type="checkbox"/></p> <p style="margin-left: 40px;">2. Industrial Boiler <input type="checkbox"/></p> <p style="margin-left: 40px;">3. Industrial Furnace <input type="checkbox"/></p> <p>2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification <input type="checkbox"/></p>

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)	(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an LD. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title (type or print) John G. Christopher, Treasurer	Date Signed June 17, 1991
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XI. Comments

Please transfer MID005356787 from G.M. Inland Fisher Guide, formerly 6307 W. Fort Street, Detroit, Michigan 48209. Note property address change due to sale of two parcels. The request represents the parcel purchased by SYBILL, Inc. for waste water treatment facility, powerhouse and incinerator.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

call
6/24/91
ok

*Site
at chgd.
address
is only
the
five
+ A.

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

10586
United States Environmental Protection Agency

Date Received:
(For Official Use Only)

U.S. EPA REGION V

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

<input checked="" type="checkbox"/> A. First Notification	<input type="checkbox"/> B. Subsequent Notification (complete item C)	C. Installation's EPA ID Number											
---	---	---------------------------------	--	--	--	--	--	--	--	--	--	--	--

II. Name of Installation (Include company and specific site name)

S Y B I L L , I N C O R P O R A T E D

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street
I 4 0 D R A G O O N

Street (continued)

City or Town	State	ZIP Code
D E T R O I T ,	M I	4 8 2 0 9 -

County Code	County Name
1 6 3	W A Y N E

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box
4 0 0 T O W N C E N T E R , S U I T E 3 0 0

City or Town	State	ZIP Code
D E A R B O R N ,	M I	4 8 1 2 6 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)	(first)
M A D I A S	V A S I L I O S
Job Title	Phone Number (area code and number)
P R E S I D E N T	3 1 3 - 3 3 6 - 7 7 5 0

VI. Installation Contact Address (See Instructions)

A. Contact Address Location	B. Street or P.O. Box
<input type="checkbox"/> Location <input checked="" type="checkbox"/> Mailing	4 0 0 T O W N C E N T E R S U I T E 3 0 0

City or Town	State	ZIP Code
D E A R B O R N	M I	4 8 1 2 6 -

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner
S Y B I L L , I N C O R P O R A T E D

Street, P.O. Box, or Route Number
4 0 0 T O W N C E N T E R S U I T E 3 0 0

City or Town	State	ZIP Code
D E A R B O R N	M I	4 8 1 2 6 -

Phone Number (area code and number)	B. Land Type	C. Owner Type	D. Change of Owner Indicator	(Date Changed) Month	Day	Year
3 1 3 - 3 3 6 - 7 7 5 0	P	P	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	0 1	0 5	9 1

ID - For Official Use Only									

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity		B. Used Oil Fuel Activities
<p>1. Generator (See Instructions)</p> <p><input type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.)</p> <p><input type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2,200 lbs.)</p> <p><input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)</p> <p>2. Transporter (Indicate Mode in boxes 1-5 below)</p> <p><input type="checkbox"/> a. For own waste only</p> <p><input type="checkbox"/> b. For commercial purposes</p> <p>Mode of Transportation</p> <p><input type="checkbox"/> 1. Air</p> <p><input type="checkbox"/> 2. Rail</p> <p><input type="checkbox"/> 3. Highway</p> <p><input type="checkbox"/> 4. Water</p> <p><input type="checkbox"/> 5. Other - specify <input type="text"/></p>	<p><input type="checkbox"/> 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see Instructions.</p> <p>4. Hazardous Waste Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketers</p> <p><input type="checkbox"/> c. Burner - indicate device(s) - Type of Combustion Device</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p><input type="checkbox"/> 5. Underground Injection Control</p>	<p>1. Off-Specification Used Oil Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input checked="" type="checkbox"/> b. Other Marketer</p> <p><input type="checkbox"/> c. Burner - indicate device(s) - Type of Combustion Device</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p>2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification</p> <p><input type="checkbox"/></p>

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)	(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

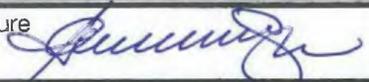
1	2	3	4	5	6
<input type="text"/>					
7	8	9	10	11	12
<input type="text"/>					

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6
<input type="text"/>					

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature 	Name and Official Title (type or print) John G. Christopher, Treasurer	Date Signed June 17, 1991
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XI. Comments

Please transfer MID005356787 from G.M.Inland Fisher Guide, formerly 6307 W. Fort Street Detroit, Michigan 48209. Note property address change due to sale of two parcels. The request represents the parcel purchased by SYBILL, Inc. for waste water treatment facility, powerhouse and incinerator.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• MID005356787 REACKNOWLEDGEMENT

GMC FISHER BODY FORT STREET
6307 WEST FORT STREET
DETROIT MI 48209

INSTALLATION ADDRESS

6307 WEST FORT STREET
DETROIT MI 48209

W M I D 0 0 5 3 5 6 7 8 7 2

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F002	2 F003	3 F005	4 F006	5 F007	6 F008
7 F009	8 F010	9 F012	10 F017	11 F018	12 F011

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	NOT APPLICABLE				17	18
19	20	21	22	23	24	
25	26	27	28	29	30	

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U031	32 U159	33 U220	34 U223	35 U238	36 U239
37 U161	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	NOT APPLICABLE				53	54
50	51	52	53	54		

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark 'X' in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.23.)

NOT APPLICABLE

1. IGNITABLE
 2. CORROSIVE
 3. REACTIVE
 4. TOXIC

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>J. W. Chadbourne</i>	OFFICIAL TITLE Plant Engineer	DATE SIGNED 7/30/80
--------------------------------------	----------------------------------	------------------------

AUG 20 1985

Mr. John W. Powser
Plant Manager
Fisher Guide Fort Street Plant
6307 West Fort Street
Detroit, Michigan 48209

RE: Request For Change in Status
to "Generator Accumulating
Waste On-Site in Compliance with
40 CFR 262.34
MID 005 356 787

Dear Mr. Powser:

We have completed our review of the closure plan and the certification of closure you submitted on March 2, 1985. A thirty-day public comment period on the plan ended on June 10, 1985, and no comments were received.

The partial closure plan is hereby approved. We understand that your facility will continue to operate as a generator accumulating waste on-site for fewer than 90 days. Since the partial closure activities are now complete, this Agency consents to the removal of the estimated costs for closing these units from the facility's closure cost estimate. Financial assurance for closure costs and liability insurance coverage must be maintained for all remaining hazardous waste management units at the facility.

If you have any questions, please contact Ms. Lorna Jereza of my staff, at (312) 886-7457.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Alan J. Howard, (MWD)

SHS-13:WMD:SWB:TPS:MI:L.Jereza:G.Words:Correction 8/09/85

S/9/85 Cmp 8/9/85

	TRP.	AUTH.	IL CHIEF	INL CHIEF	HL CHIEF	HA/PA CHIEF	OH. CHIEF	E'S CHIEF	WMT CHIEF	WML MGR
INT. DATE	A.W. 8/14/85	<i>[Signature]</i> 8/16/85			<i>[Signature]</i> 8/16/85			<i>[Signature]</i> 8/9/85	DAS 8/12/85	<i>[Signature]</i> 8/13/85



Fisher Body

Division of General Motors Corporation



General Offices

30001 Van Dyke Avenue

Warren, Michigan 48090

October 3, 1983

Subject: Delegation of Authority to Sign
Permit Applications under EPA
Permit Programs

From: C. Katko

M 10005356797 G, TSD, PA

To: J. W. Powser
Detroit Fort Street Plant Manager

As provided under 40 CFR 122.22, 144.32, 233.6 and 270.11 of the "Environmental Permit Regulations", the position of plant manager is hereby designated as my duly authorized representative for Fisher Body Detroit Fort Street. As such, the plant manager is authorized to sign all permit applications, all reports required by permits, and other information requested by EPA or a corresponding state or municipal agency, submitted for the following programs:

1. National Pollutant Discharge Elimination System (NPDES) of the Clean Water Act (40 CFR 122)
2. Underground Injection Control Program of the Safe Drinking Water Act (40 CFR 144)
3. Dredge of Fill (404) Program of the Clean Water Act (40 CFR 233)
4. Hazardous Waste Permit Program of the Resource Conservation and Recovery Act (40 CFR 270)

In the absence of the individual occupying the designated position due to vacation, illness, or other reasons, the individual temporarily responsible for the operation of the facility or activity is my duly authorized representative.

C. Katko



11D 005 356 787
G TSD PA

To See Below

Location

From Mr. J. W. Cagle

Location

M 11D 005 356 787

Subject Delegation of Authority to Sign
Reports Under EPA Consolidated
Permit Programs

Date March 24, 1981

TO: All Parts Plant Managers
All P.D.C. Managers
All Truck and Coach Managers

As required under Environmental Protection Agency Consolidated Permit Programs, Part 122, Section 122.6, the position of Plant Manager is hereby designated as my duly authorized representative for your facility. As such, the Plant Manager is authorized to sign all reports required by permits, and other information requested by the EPA Regional Administrator and/or the State/Local Program Director.

In the absence of the person occupying the designated position due to vacation, illness, or other reasons, the person temporarily responsible for the operation of the facility or activity is my duly authorized representative.

Any questions should be directed to the Environmental Control Group - Flint Central Office.

J. W. Cagle
General Manager
General Motors Warehousing and
Distribution Division

JWC/vp

cc: EPA Regional Administrator

FORM 1	U.S. ENVIRONMENTAL PROTECTION AGENCY	GENERAL INFORMATION <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER FMID005356787
LABEL ITEMS EPA I.D. NUMBER III. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION			GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.
PLEASE PLACE LABEL IN THIS SPACE			

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	GMC FISHERY BODY FORT STREET
---	------	------------------------------

IV. FACILITY CONTACT

2	A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
	CHADBOURNE, RICHARD PLANT ENGR.	313 554 6839

V. FACILITY MAILING ADDRESS

3	A. STREET OR P.O. BOX		
	6307 WEST FORT STREET		
4	B. CITY OR TOWN	C. STATE	D. ZIP CODE
	DETROIT	MI	48209

VI. FACILITY LOCATION

5	A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER				
	6307 WEST FORT STREET				
6	B. COUNTY NAME	C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
	WAYNE	DETROIT	MI	48209	

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FORM 3 RCRA **EPA** **U.S. ENVIRONMENTAL PROTECTION AGENCY**
HAZARDOUS WASTE PERMIT APPLICATION
 Consolidated Permits Program
 (This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER
 S F M I D 0 0 5 3 5 6 7 8 7 T/A C I

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

1. FACILITY HAS INTERIM STATUS

2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5	T 0 2	1,728,000	U	
X-2	T 0 3	20	E		6				
1	S 0 1	52,800	G		7				
	S 0 2	1,000	G		8				
3	S 0 4	14,000	G		9				
4	T 0 1	1,440,000	U		10				

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

<u>ENGLISH UNIT OF MEASURE</u>	<u>CODE</u>	<u>METRIC UNIT OF MEASURE</u>	<u>CODE</u>
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

IV. DESCRIPTION OF HAZARDOUS WA. § (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)															
S	F	M	I	D	0	0	5	3	5	6	7	8	7	VIA	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

42 18 19 N

083 06 09 W

VIII. FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

E											
17	18	19	20	21	22	23	24	25	26	27	28

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

F				G			
29	30	31	32	33	34	35	36

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

C. Katko, General Manager



11-18-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

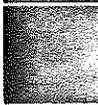
B. SIGNATURE

C. DATE SIGNED



Fisher Body

Division of General Motors Corporation



223

Detroit Fort Street Plant

6307 West Fort Street

Detroit, Michigan 48209

EXISTING ENVIRONMENTAL PERMITS

APC	903068
"	903055
"	903049
"	903048
"	903051
"	903056
"	903065
"	903041
"	903057
"	903038
"	903043
"	903064
"	903066
"	903067
"	903061
C	5220
"	5040
APC	903062
C	5188
APC	903031
"	903032
"	903033
"	903034
"	920227
"	903050
"	903046
"	903042
"	903053
"	903047
"	903039
"	903040
"	903036
"	903052
"	903059
"	903058
"	903035
"	903060
"	903045
"	903044
"	903037

FORM 1
GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION
 Consolidated Permits Program
 (Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

I. EPA I.D. NUMBER

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 **SKIP** GMC FISHER BODY FORT STREET

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)
 2 CHADBOURNE, RICHARD PLANT ENGR.

B. PHONE (area code & no.)
 313 554 6839

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX
 3 6307 WEST FORT STREET

B. CITY OR TOWN
 4 DETROIT

C. STATE
 MI

D. ZIP CODE
 48209

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER
 5 6307 WEST FORT STREET

B. COUNTY NAME
 WAYNE

C. CITY OR TOWN
 6 DETROIT

D. STATE
 MI

E. ZIP CODE
 48209

F. COUNTY CODE (if known)
 163

A. J.
5/6/82

SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
3	7	1	4	(specify)	7		(specify)
MOTOR VEHICAL PARTS & ACCESSORIES							
C. THIRD				D. FOURTH			
(specify)				(specify)			

I. OPERATOR INFORMATION

A. NAME										B. Is the name listed in Item VIII-A also the owner?	
GMC FISHER BODY FORT STREET										<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)								D. PHONE (area code & no.)			
F = FEDERAL		M = PUBLIC (other than federal or state)		P (specify)		C		A		A	
S = STATE		O = OTHER (specify)				3		1		3	
P = PRIVATE						5		5		4	
						6		8		3	
						8		3		9	
E. STREET OR P.O. BOX											
307 WEST FORT STREET											
F. CITY OR TOWN						G. STATE		H. ZIP CODE		IX. INDIAN LAND	
DETROIT						MI		48209		Is the facility located on Indian lands?	
										<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)						D. PSD (Air Emissions from Proposed Sources)					
N A						P N A					
B. UIC (Underground Injection of Fluids)						E. OTHER (specify)					
N A						C 5 1 8 7 (SEE LIST)					
C. RCRA (Hazardous Wastes)						E. OTHER (specify)					
N A						N A					

MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

I. NATURE OF BUSINESS (provide a brief description)

MANUFACTURE AUTOMOTIVE HARDWARE AND TRIM

II. CERTIFICATION (see instructions)

certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
C. Katko, General Manager		<i>C. Katko</i>		11-18-80	

COMMENTS FOR OFFICIAL USE ONLY

--	--

Use print or type in the unshaded areas only (fill-in areas are spaced for elite type, i.e., 12 characters/finch).

FORM 3 RCRA HAZARDOUS WASTE PERMIT APPLICATION U.S. ENVIRONMENTAL PROTECTION AGENCY Consolidated Permits Program (This information is required under Section 3005 of RCRA.) I. EPA I.D. NUMBER FMID0053567873

FOR OFFICIAL USE ONLY APPLICATION APPROVED DATE RECEIVED (yr., mo., & day) COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

 2. NEW FACILITY (Complete item below.)

 FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

 FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

 1. FACILITY HAS INTERIM STATUS

 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

 1. AMOUNT - Enter the amount.

 2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<u>Storage:</u>			<u>Treatment:</u>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
<u>Disposal:</u>					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5	T 0 2	1,728,000	U	
X-2	T 0 3	20	B		6				
1	S 0 1	52,800	G		7				
-	S 0 2	1,000	G						
3	S 0 4	14,000	G		9				
4	T 0 1	1,440,000	U		10				

SEE AMENDMENT 12/10/81

I. PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "TV"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

V. DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

1. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA ID. NO. (enter from page 1)

M	I	D	0	0	5	3	5	6	7	8	7	3	6	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

A

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly depict all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

4	2	1	8	1	9
65	66	67	68	69	71

0	8	3	0	6	0	9
72	74	75	76	77	79	

VIII. FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

C. Katko, General Manager

C. Katko

11-18-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

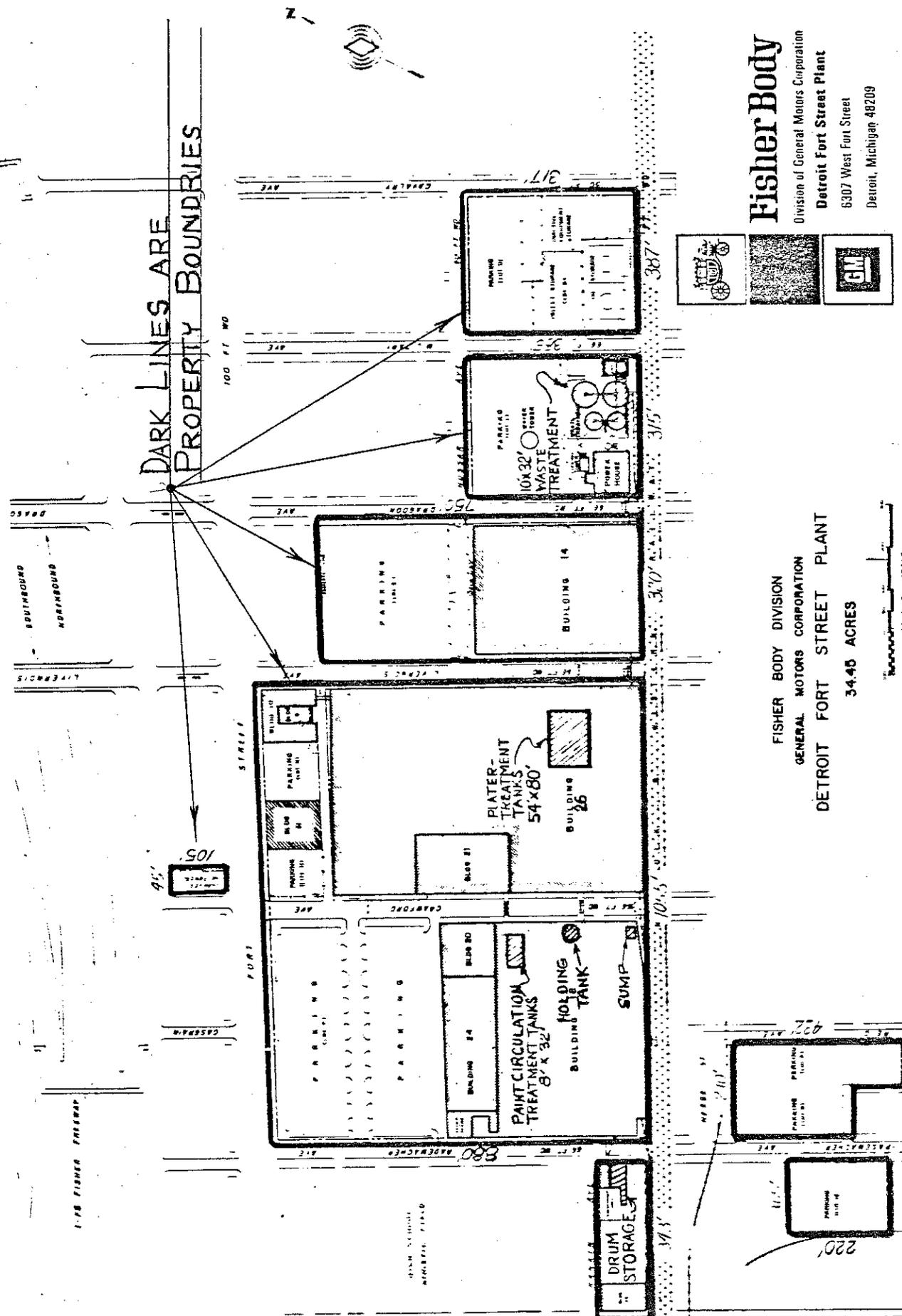
A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

V. FACILITY DRAWING (see page 4)

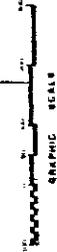
DARK LINES ARE PROPERTY BOUNDARIES



Fisher Body
 Division of General Motors Corporation
Detroit Fort Street Plant
 6307 West Fort Street
 Detroit, Michigan 48209



FISHER BODY DIVISION
 GENERAL MOTORS CORPORATION
DETROIT FORT STREET PLANT
 34.45 ACRES



IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

RECEIVED

DEC

WASTE MANAGEMENT BRANCH
EPA REGION 3

EPA I.D. NO. (enter from page 1)															
5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
F	M	I	D	0	0	5	3	5	6	7	8	7		6	

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)										LONGITUDE (degrees, minutes, & seconds)										
	4	2		1	8		1	9	N			8	3		0	6		0	9	W

VIII. FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER										2. PHONE NO. (area code & no.)									
3. STREET OR P.O. BOX										4. CITY OR TOWN									
5. ST.										6. ZIP CODE									

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type) C. Katko, General Manager	B. SIGNATURE <i>C. Katko</i>	C. DATE SIGNED 12-2-81
--	---------------------------------	---------------------------

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
-------------------------	--------------	----------------

RECEIVED
12/1/81



DETROIT RIVER

NEVENU COPPER
& BRASS

CAMARON

WALSH

DRAGON

WILAS

BLDG. 30
1972
210

BLDG. 28
1968
4,888

BLDG. 29
1957
1,900

BLDG. 18
1922
1116,5211

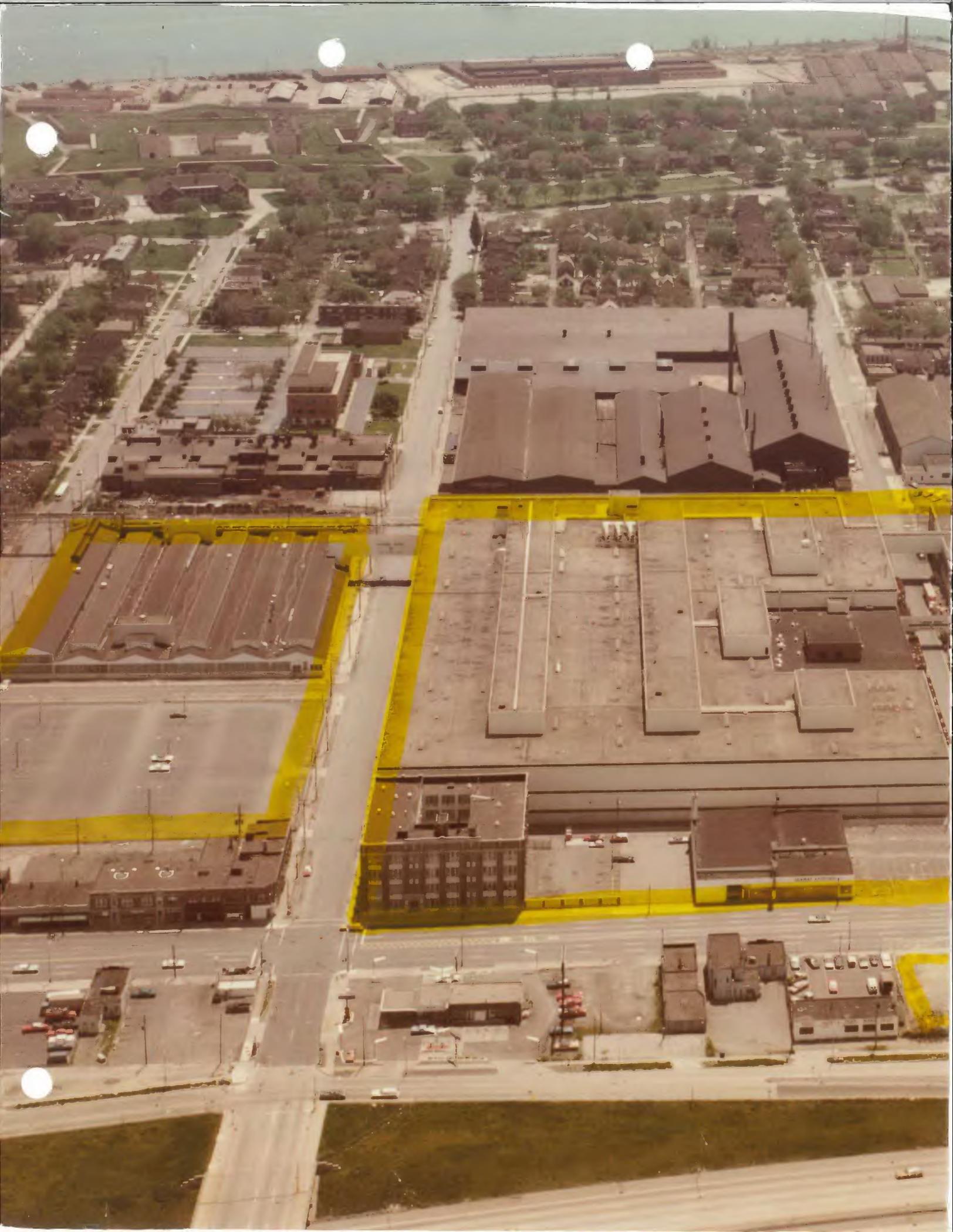
D-LOT

I-LOT

E-LOT

FORE ST.





ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983. Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

- 1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

II. GENERATOR'S EPA I.D. NUMBER

- For 1983 Only
Permanently
Other

F M I D 0 0 5 3 5 6 7 8 7 1
1 2 13 14 15

C303 ENTRY (OFFICIAL USE ONLY):

III. NAME OF INSTALLATION

G M C F I S H E R B O D Y D I V . D E T R O I T F O R T S T P L T
30 69

IV. INSTALLATION MAILING ADDRESS

3 6 3 0 7 W E S T F O R T S T R E E T
15 16 45
Street or P.O. Box
4 D E T R O I T M I 4 8 2 0 1 9
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5
15 16 45
Street or Route number
6
15 16 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

2 M E L V I N A G I L M E R J R
15 16 45
Name (last and first)
3 1 3 5 5 4 7 0 1 0
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. W. Powser Plant Manager
Print/Type Name Title

Signature of Authorized Representative

2/16/84
Date Signed

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 7 8 7 1
T/A C
 1 2 13 14 15

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 7 0 0 2 6 0 2
 16 28

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

XI. FACILITY ADDRESS

27140 Princeton Avenue
 P. O. Box 431
 Inkster, Michigan 48141

XII. TRANSPORTATION SERVICES USED

Environmental Waste Control
 27140 Princeton Avenue
 Inkster, Michigan 48141 EPA I. D. No. MID 057002602

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	Waste Methylene Chloride Mixture of Isocyanates and Polyol From Foam Flush	1 5 35 33 34 43	F 0 0 2 U 2 2 3 38 39 42	1 3 6 9 5	G
	2	Waste Corrosive Liquid From Plater Basement	0 2	F 0 0 6	5 2 8	P
	3	Waste Chromic Acid Sludge From Plater Basement	0 2	D 0 0 7 F 0 0 6	1 6 7	P
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Waste Methylene Chloride = 11.0 lbs./gal.

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

M I D 0 0 5 3 5 6 7 8 7 1
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chem-Met Services, Inc.

X. FACILITY'S EPA I.D. NO.

M I D 0 9 6 9 6 3 1 9 4
16 28

XI. FACILITY ADDRESS

18550 Allen Road
 Wyandotte, Michigan 48192

XII. TRANSPORTATION SERVICES USED

Nelson Industrial Services
 12345 Schaefer Highway
 Detroit, Michigan 48227 EPA I.D. No. MID 088011992

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	32	1 Waste Methylene Chloride Mixture of Isocyanates and Polyol From Foam Line Flush	1, 5	F, 0, 0, 2, 0, 2, 2, 3 35 0, 0, 8, 0 38 39 42 33 34 43 46 47 50 51	1 5 4 0	G
	2	2 Hazardous Waste Solid From Paint Line	1, 5	D, 0, 0, 1	1 2 6 5	G
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Item #1 - 11.0 lbs./gal.
 Item #2 - 9.8 lbs./gal.

Tear out here

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 7 8 7 1
 1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 7 0 0 2 6 0 2
 16 28

XI. FACILITY ADDRESS

27140 Princeton Avenue
 P. O. Box 431
 Inkster, Michigan 48141

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental
 22077 Mound Road
 Warren, Michigan 48091 MID 087478574

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	32	1 Obsolete S. C. 3070 TD Solvent From Western Eaton Dot S. N. Solvent Mixture N.O.S.	0,8 33 34 43	D,0,0,1 35 38 39 42	4,0,2	P
	2	2 Obsolete S. C. 3D Solvent from Western Eaton Dot S. N. Solvent Mixture N.O.S.	0,8	D,0,0,1	1,6,0,6	P
	3	3 Obsolete #114 Stripper Dot S. N. Dichloromethane	1,5	U,0,8,0	6,0,5	P
	4	4 Obsolete Di-Octyl Phthalate Dot S. N. ORM-A, N.O.S.	1,5	U,1,0,7	9,1,7	P
	5	5 Obsolete 44-24 Solvent Dot S. N. Paint Reducing Liquid	0,8	D,0,0,1	4,0,2	P
	6	6 Obsolete Permalastic Adhesive Dot S. N. Cement Liquid N.O.S.	0,8	D,0,0,1	3,4,1	P
	7	7 Obsolete Trichloromonofluoro-Methane Dot S. N. ORM-A N.O.S.	1,3	U,1,2,1 F,0,0,2	4,0,2	P
	8	8 Obsolete Isocyanate From Mobay Dot S. N. Poison B, Liquid N.O.S.	1,8	P,0,6,4	1,6,5,0	P
	9	9 Obsolete Plasticizer Dot S. N. ORM-A, N. O. S.	1,3	U,0,8,8	4,5,6	P
	10	10 Obsolete Toluene Dot S. N. Toluene	0,8	D,0,0,1 F,0,0,5 U,2,2,0	3,9,7	P
	11	11 Obsolete Mek Dot S. N. Methylene Ketone	0,8	F,0,0,5 D,0,0,1	7,3,2	P
	12	12 Obsolete Low Flash Solvents Dot S. N. Paint Reducing Liquid	0,8	D,0,0,1	4,0,2	P

XIV. COMMENTS (enter information by section number--see instructions)

Dot S. N. = Department of Transportation Shipping Name.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 7 8 7 1 1
1 2 13 14 15

Environmental Waste Control

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 7 0 0 2 6 0 2
16 28

XI. FACILITY ADDRESS

27140 Princeton Avenue
 P. O. Box 431
 Inkster, Michigan 48141

XII. TRANSPORTATION SERVICES USED

Great Lakes Environmental
 22077 Mound Road
 Warren, Michigan EPA I.D. No. MID 087478574

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	32	1 Obsolete Mek Dot S. N. Methyl Ethyl Ketone	0, 8	D, 0, 0, 1 35 36 37 38 39 40 41 42	3, 6, 9	P
		2 Obsolete Methyl Isoamyl Ketone Dot S. N. Solvent N.O.S.	0, 8	D, 0, 0, 1	3, 7, 3	P
		3 Obsolete Xylene Dot S. N. Xylene	0, 8	D, 0, 0, 1	7, 8, 9	P
		4 Obsolete Low Flash Solvents Dot S. N. Solvent N.O.S.	0, 8	D, 0, 0, 1	1, 8, 4, 3	P
		5 Obsolete Acrylic Reducer Dot S. N. Compound Reducing Liquid	0, 8	D, 0, 0, 1	8, 0, 0	P
		6				
		7				
		8				
		9				
		10				
		11				
		12				

Tear out here

XIV. COMMENTS (enter information by section number—see instructions)

Dot S. N. = Department of Transportation Shipping Name.

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983. Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Explain your non-regulated status in the space below.

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983.

Please print/type with elite type (12 characters per inch)

II. FACILITY EPA I.D. NUMBER

F M I D 0 0 5 3 5 6 7 8 7 1
1 2 13 14 15 T/A C

This Facility's Non-Regulated Status is Expected to Apply:

- For 1983 Only Permanently
 Other (explain in comment section)

C303 ENTRY (OFFICIAL USE ONLY):

III. NAME OF FACILITY

F I S H E R | B O D Y | D E T R O I T | F O R T | S T R E E T | P L A N T
30 69

IV. FACILITY MAILING ADDRESS

3 6 3 0 7 | W E S T | F O R T | S T R E E T
15 16 45

Street or P.O. Box

4 D E T R O I T | M I 4 8 2 0 9
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF FACILITY (if different than section IV above)

5
15 16 45
Street or Route number

6
15 16 41 42 47 51
City or Town State Zip Code

VI. FACILITY CONTACT

2 G I L M E R | M E L V I N
15 16 45
Name (last and first)

3 1 3 | 5 5 4 | 7 0 1 0
46 55
Phone No. (area code & no.)

VII. COST ESTIMATES FOR FACILITIES

\$ 1 3 | 2 0 3 | \$ 2 5 | 2 8 | 3 1
16 19 22 25 28 31
A. Cost Estimate for Facility Closure B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. W. Powser Plant Manager
Print/Type Name Title

[Signature]
Signature of Authorized Representative

2/16/84
Date Signed

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

T/A C

F M I D 0 0 5 3 5 6 7 8 7 1 1
 1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 5 6 7 8 7
 16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

Fisher Body Fort Street Plt ON-SITE

XII. GENERATOR ADDRESS

6307 West Fort Street
 Detroit, Michigan 48209

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 9 6 8 0 UOM S02 _____ UOM S03 _____ UOM
 AMOUNT OF WASTE AMOUNT OF WASTE AMOUNT OF WASTE
 S04 _____ UOM S05 _____ UOM
 AMOUNT OF WASTE AMOUNT OF WASTE

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29	32	Spent Methylene Chloride Flush of Urethane Foam Gun Heads; Mixture $McCl_2$, Isocyanates, Polyol	F 0 0 2 38 0 8 30 41 44 45 48	S 0 1 49 51 52	8 8 4 0	P 60 61
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XV. COMMENTS (enter information by section number—see instructions)

Tear out here



Fisher Body
Division of General Motors Corporation

2 Reports

Detroit Fort Street Plant
6307 West Fort Street
Detroit, Michigan 48209

February 14, 1984

United States Environmental Protection Agency
Region V
P.O. Box A-3587
Chicago, IL 60690-3587

Attn: Karl J. Klepitsch Jr.
Chief of Waste Management Branch

Gentlemen:

Enclosed you will find our "Hazardous Waste Treatment Storage and Disposal Facility" and "Hazardous Waste Generator" reports for 1983 in accordance with Sections 3002, 3004 3007 of the Resource Conservation and Recovery Act and Subparts 264.75 and 262.41 of Title 40 of the Code of Federal Regulations.

Any questions in relation to these reports may be directed to Mel Gilmer of my office at (313) 554-7010.

Sincerely,

R. J. Tessier
Plant Engineer

MAG:vm

Enclosure

cc: Chris Bates, Fisher Body Works Engineering
Jack Eisenlord, Fisher Body, DFS
John Powser, Fisher Body, DFS
Edmund Vig, Fisher Body, DFS
Mitch Zdyb, Environmental Activities Staff

MID 005356787

A.4 Closure/Post-
Closure

AUG 22 1985CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John W. Powser
Plant Manager
Fisher Guide Fort Street Plant
6307 West Fort Street
Detroit, Michigan 48209

RE: Corrective Action/Closure
Facility Name: Fisher Guide Fort
Street Plant
U.S. EPA ID #: MTB 005 356 787

Dear Mr. Powser:

As you are aware, we have approved your request for partial closure of your facility referenced above which is regulated under the Resource Conservation and Recovery Act (RCRA).

On November 9, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend RCRA. Under Section 206 and Section 233 (copies enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken, or will be taken, pursuant to a decision on your closure plan. An important part of our determination includes your willingness (or unwillingness) to sign the enclosed certification statement. Please read it carefully, and either sign it and return it, or return it to us unsigned with a cover letter of explanation, within three weeks of the date of this letter. Any tentative decision we make regarding releases of hazardous waste or hazardous constituents to the environment will be included in a public notice inviting public comment on our tentative decision. Public notice will be in a newspaper of general circulation in the area of the facility.

Please call Ms. Lorna Jereza, at (312) 886-7457 if you have any questions, or wish to discuss this matter further.

Sincerely yours,

Edith M. Ardiente, P.E.
Chief, Technical Programs Section

Enclosure(s)

cc: State Permit Manager

SHS-13:SHB:TPS:MI:L.Jereza:G.Words:Correction:8/09/85

*nk
8/20/85*

	TYP.	ANTI.	L. CHIEF	IN. CHIEF	MI. CHIEF	MM/WI CHIEF	OH. CHIEF	TPS CHIEF	WMB CHIEF	WMO DIR
INT. DATE	<i>8/09/85</i>	<i>8-14-85</i>			<i>8-14-85</i>	<i>85</i>		<i>8/20/85</i>		

gn

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

May 31, 1985

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E. R. CAROLLO
MARLENE J. FLUHARTY
STEPHEN F. MONSMA
O. STEWART MYERS
RAYMOND POUPORE
HARRY H. WHITELEY

Ms. Edith M. Ardiente, P.E.
Chief, Technical Programs Section
U.S. EPA - Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Closure Plan
Fisher Guide Fort Street Plant
Detroit, Michigan
MID 005356787

Dear Ms. Ardiente:

We have reviewed the closure plan submitted in lieu of a Part B application for the above referenced facility for compliance with RCRA interim status standards under 40 CFR, Part 265. After a generator inspection of the facility site in which a few minor deficiencies were found, we feel the request for closure of the container storage area should be granted.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Andrea R. Schoenrock".

Andrea R. Schoenrock
Permits Engineer
Hazardous Waste Division
517-373-2730

cc: K. Damrel
K. Burda
M. Higgins
C&E File
File



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 230 SOUTH DEARBORN ST.
 CHICAGO, ILLINOIS 60604

Yellow

REPLY TO THE ATTENTION OF:

5HS-13

APR 16 1985

Mr. Alan J. Howard, Chief
 Technical Services Section
 Hazardous Waste Division
 Michigan Department of Natural Resources
 P.O. Box 30028
 Lansing, Michigan 48909

RE: Closure Plan
FISHER GUIDE FORT STREET PLANT
DETROIT, MICHIGAN
MD 005356797

Dear Mr. Howard:

Enclosed is/are ONE (1) copy(s) of a closure plan for the referenced facility. Please perform a technical evaluation of the plan, and provide us your comments by JUNE 12, 1985.

If you have any questions on the closure plan, please contact L. M. JEREJA of my staff, at (312) 886-6146.

Sincerely,

Edith M. Ardiente

Edith M. Ardiente, P.E.
 Chief, Technical Programs Section

Enclosure(s)

cc: Mary Higgins
 HWDMS Update File

	TYPYST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	<i>G.W.</i>	<i>LMJ</i>			<i>MI</i> <i>LMJ</i>			
DATE	<i>4-16-85</i>	<i>4-16-85</i>			<i>4-16-85</i>			

"GENERATOR ACCUMULATING WASTE ON-SITE IN COMPLIANCE WITH 40 CFR 262.34"

(APPLICABLE TO FACILITIES WHICH, AS OF NOVEMBER 19, 1980, HAVE BEEN STORING WASTES IN CONTAINERS AND/OR TANKS ONLY)

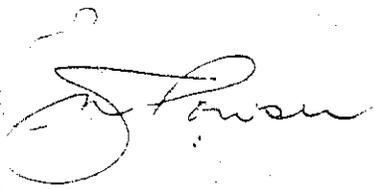
Facility Name:	Fisher Guide Fort Street Plant
Facility Location:	6307 West Fort Street Detroit, Michigan 48209
Mailing Address:	SAME
U.S. EPA ID No.:	MID 005356787

1. I certify, in reference to the above-named facility, that a complete and accurate description of the activities currently conducted, for purposes of the Resource Conservation and Recovery Act (RCRA), are those of a generator accumulating waste on-site in compliance with 40 CFR 262.34. This description of activities shall be considered effective as of

March 2, 1984

(please type in above: today's date, or other appropriate past date)

2. I certify that all hazardous waste which had been stored at this facility for greater than 90 days have been permanently removed and -- for that portion of the wastes that were present on-site on or after November 19, 1980 -- the manifest requirements of 40 CFR Part 262 have been complied with, and all manifests are on file at this facility, available for inspection by authorized State and Federal officials.
3. I finally certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

	John W. Powser Plant Manager	3/2/85
---	---------------------------------	--------

Signature

Type Name and Title

Date

(Please have appropriate official, per 40 CFR 270.11 sign and date)



MAR 26 1987

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5HE-12

MID 005 356 787

General Motors Corporation
General Motors Building
3044 W. Grand Boulevard
Detroit, Michigan 48202

Re: RCRA Financial Responsibility

Dear Owner/Operator:

On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the United States Environmental Protection Agency (U.S. EPA) to administer a hazardous waste program in lieu of the Federal program. As a result of final authorization, Michigan is required to enforce the provisions of the Resource Conservation and Recovery Act (RCRA). One of these provisions (40 CFR Part 265, Subpart H) requires all hazardous waste facilities to demonstrate financial responsibility for liability coverage and closure/post-closure care.

To implement this aspect of authorization, financial documents must be written to satisfy the requirements of the Michigan Administrative Code 1985 AACs, Part 7, which is the Michigan equivalent of 40 CFR Part 265, Subpart H. This letter is to notify you that your financial test should be updated and sent to the Director of the Michigan Department of Natural Resources within 90 days after the close of your fiscal year.

If you have any questions or desire additional information, please contact Ms. Sharon Johnson at (312) 886-4581 or Ronald Brown at (312) 353-7921.

Sincerely yours,

William E. Muno

William E. Muno, Chief
RCRA Enforcement Section

cc: John Bohunsky, MDNR

U.S. EPA ID #: MID000721 ✓

GMC ROCHESTER PROD DIV COOPERSVILL*
2100 BURLINGAME
GRAND RAPIDS MI 49501

U.S. EPA ID #: MID003912920 ✓

GMC WHS & DIST DIV DRAYTON PLAINS
6060 W BRISTOL ROAD
FLINT MI 48554

U.S. EPA ID #: MID980700827 ✓

GMC OLDSMOBILE DIV PLTS 2 & 3
P O BOX 30061
LANSING MI 48909

U.S. EPA ID #: MID017079625 ✓

GMC ROCHESTER PROD DIV WYOMING PLT
2100 BURLINGAME
GRAND RAPIDS MI 49501

U.S. EPA ID #: MID005356902 ✓

GMC TRUCK & BUS GROUP
660 S BLVD E
PONTIAC MI 48053

U.S. EPA ID #: MID003906773 ✓

GMC WHS & DIST DIV FLINT
6060 W BRISTOL ROAD
FLINT MI 48554

U.S. EPA ID #: MID005356660 ✓

GMC FISHER BODY DIV COLDWATER RD
1245 E CULLWATER RD
FLINT MI 48559

U.S. EPA ID #: MID005356787 ✓

GMC FISHER BODY DIV FORT ST
6307 WEST FORT STREET
DETROIT MI 48209

U.S. EPA ID #: MID000718544 ✓

GMC GMAD LAKE ORION TWP PLT
PO BOX 347
LAKE ORION MI 48035

U.S. EPA ID #: MID000724740 ✓

GMC HYDRA-MATIC DIV
ONE HYDRA-MATIC DRIVE
THREE RIVERS MI 49093

U.S. EPA ID #: MID005356704 ✓

GMC CADILLAC MOTOR CAR CLARK PLT
2860 CLARK ST
DETROIT MI 48232

U.S. EPA ID #: MID000718551 ✓

GMC HYDRA-MATIC DIV THREE RIVERS P*
ONE HYDRA-MATIC DR
THREE RIVERS MI 49093

U.S. EPA ID #: MID005356688 ✓

GMC CHEVROLET BAY CITY
100 FITZGERALD ST
BAY CITY MI 48706

U.S. EPA ID #: MID005356894 ✓

GMC OLDSMOBILE DIV PLT 1
P O BOX 30061
LANSING MI 48909

U.S. EPA ID #: MID086744802 ✓

GMC CHEVROLET DETROIT GEAR AND AXLE
1840 HOLBROOK AVE
DETROIT MI 48212

U.S. EPA ID #: MID082220757 ✓

GMC PROVING GROUND MILFORD
HICKORY RIDGE & GM ROADS
MILFORD MI 48042

U.S. EPA ID #: MID005356621 ✓

GMC CHEVRDLET LIVONIA
13000 ECKLES RD
LIVONIA MI 48151

U.S. EPA ID #: MID980568836 ✓

GMC TRUCK & COACH DIV PONTIAC WEST
660 S BLVD E
PONTIAC MI 48053

U.S. EPA ID #: MID005356803 ✓

GMC DETROIT DIESEL ALLISON DIV RED*
13400 WEST OUTER DR
DETROIT MI 48239

U.S. EPA ID #: MID980700843 ✓

GMC OLDSMOBILE DIV PLT 5
P O BOX 30061
LANSING MI 48909

U.S. EPA ID #: MID98056E 3 ✓

GMC AC SPARK PLUG DIV DAVISON ENG
1300 NORTH DORT HIGHWAY
FLINT MI 48556

U.S. EPA ID #: MID005356647 ✓

GMC AC SPARK PLUG DIV DDRT HWY
1300 N DORT HWY
FLINT MI 48556

U.S. EPA ID #: MID980568570 ✓

GMC AC SPARK PLUG DIV WASTE TRMT
1300 N DDRT HIGHWAY
FLINT MI 48556

U.S. EPA ID #: MID005356795

GMC ASSEMBLY DIV
2625 TYLER ROAD
YPSILANTI MI 48197 ✓

U.S. EPA ID #: MID005356696 ✓

GMC CENTRAL FOUNDRY DIV SAG MAL IR*
77 W CENTER ST
SAGINAW MI 48605

U.S. EPA ID #: MID076380583 ✓

GMC CHEVROLET DETROIT ASSEMBLY
601 PIQUETTE
DETROIT MI 48202

U.S. EPA ID #: MID005356654 ✓

GMC CHEVROLET FLINT MFG
300 NORTH CHEVROLET AVENUE
FLINT MI 48555

U.S. EPA ID MID041793340 ✓

GMC CHEVROLET SAGINAW CASTING & PA*
2100 VETERANS MEMORIAL PARKWAY
SAGINAW MI 48601

U.S. EPA ID #: MID000809905 ✓

GMC DETROIT DIESEL ALLISON ROMULUS*
36880 ECKORSE RD
ROMULUS MI 48174

U.S. EPA ID #: MID005356712 ✓

GMC BUICK MOTOR DIV
902 E HAMILTON ST BLDG 85
FLINT MI 48550

U.S. EPA ID #: MID084571256 ✓

GMC CHEVRDLET ADRIAN MFG
1450 E BEECHER ST
ADRIAN MI 49221

U.S. EPA ID #: MID020105565 ✓

GMC CHEVROLET DETROIT FORGE
8435 ST AUBIN
DETROIT MI 48212

U.S. EPA ID #: MID005356951 ✓

GMC CHEVRDLET FLINT VAN SLYKE COMP*
G-3248 VAN SLYKE RD
FLINT MI 48552

U.S. EPA ID #: MID005356845 ✓

GMC CHEVROLET SAGINAW MFG
2328 EAST GENESEE AVE
SAGINAW MI 48605

**C.2 Compliance
And Enforcement**

RECEIVED
FEB 07 1992
PRC

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

February 3, 1992

Ms. Michelle Fisher
Attorney
Office of General Counsel
General Motors Corporation
New Center One Building
3031 West Grand Boulevard
Detroit, MI 48232

Subject: Request for information regarding the former General Motors Corporation, Fisher Body Division, Detroit Fort Street Plant, 6307 West Fort Street, Detroit, Michigan (MID005356787)

Dear Ms. Fisher:

As you requested, I am submitting a written request for information regarding the former General Motors Corporation, Fisher Body Division, Detroit Fort Street Plant. We are missing from our files basic background information on the facility's former operations and waste management practices. Files indicate that a closure plan was submitted in lieu of a RCRA Part B permit application for the former drum storage area. Files also indicate that certification of the closure was submitted on March 2, 1985. We do not have copies of the closure plan or the certification of closure. We would appreciate your help in obtaining copies of them.

We are requesting any information that will enhance our technical understanding of the past waste flows and handling, treatment, storage, and disposal practices. This includes any information regarding past manufacturing and waste management activities and any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, or sampling data sheets that might be available.

A list of potential solid waste management units (SWMU) and areas of concern (AOC) identified during our visual site inspection is enclosed as an attachment. Outlined in this attachment are the specific questions we need answered in order to complete our report. In addition, information we obtained during the VSI indicates that a 1,300 gallon spill of diphenyl methane diisocyanate (MDI) occurred on November 21, 1984. No specific information regarding the location, history, and cleanup of the spill has been provided. Because of the lack of information regarding the incident, we have identified the spill as an area of concern (AOC).

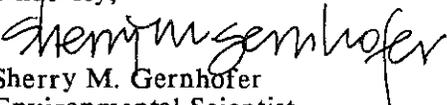
I understand, through conversations with Mr. David Tackman of Inland Fisher Guide and Stuart Lichter of S.L. Warehousing Detroit, Ltd., that an extensive environmental assessment was performed at the facility before the property was transferred. It would be extremely helpful if we could obtain a copy of this document.



Michelle Fisher - page 2

Your cooperation and assistance in compiling this information will help greatly to expedite our efforts. We intend to use this information to construct the most accurate description of the facility possible. I do apologize for giving you short notice; however, we understood, through conversations with David Tackman, that this information would be provided to us two months ago. Thank you for your assistance. If you have any questions about this request, please call me at (703) 883-8888.

Sincerely,


Sherry M. Gernhofer
Environmental Scientist

Attachment

cc: Paul Wooldridge, PRC
Shin Ahn, PRC
Kevin Pierard, EPA Region 5

ATTACHMENT

**GMC FISHER BODY PLANT
DETROIT, MICHIGAN**

Name: Wastewater treatment facility receiving tanks (SWMU 1), wastewater treatment facility treatment tanks (SWMU 2), incinerators (SWMU 3), former drum storage area (SWMU 4), and diphenyl methane diisocyanate spill (AOC 1).

Regulatory Status: Identify any operational permit or permit application and cite the federal, state, or local regulations applicable to these units

Unit Characteristics: General description, including location, dimensions, SWMU or AOC components, construction material, secondary containment, and other relevant characteristics

Operational History: Dates of operation

Current Status: Active, inactive, physically closed, approved closed, or certified closed

Waste Characteristics: Description of types, volumes, and hazardous or nonhazardous characteristics of waste media

Waste Management: Description of handling, treatment, storage, and disposal practices, including names and addresses of disposal facilities used

Release History: Visual evidence or reports of releases of hazardous material, including associated dates and any regulatory actions taken

Potential Pathways: Potential migration pathways such as air, surface water, ground water, soil, or subsurface gas

Exposure Potential: Location and use of nearby water wells, surface water, and other water sources that are potential human and environmental receptors of releases

Remedial Action: Description of any remedial action undertaken as a result of past releases, including dates and types of remediation performed and disposition of waste media.

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. GUYER
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

~~XXXXXXXXXXXXXXXXXXXX~~

Gordon E. Guyer, Director
Waste Management Division
505 W. Main
Northville, MI 48167

Cross #

July 16, 1987

Michael Melekian, Environmental Engineer
GMC, Fisher Guide Division
6307 W. Fort Street
Detroit, MI 48209-2975

RE: MID 005356787

Dear Mr. Melekian,

This letter is to acknowledge receipt of your letter dated June 18, 1987 indicating your compliance program for deficiencies cited during my inspection on June 1, 1987. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please contact me at (313) 344-4670.

Sincerely,

Faye Dade
Environmental Quality Analyst

FD/mkp

cc: B. Okwumabua
U.S. EPA, Region V

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
E. R. CAROLLO
ACOB A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

June 20, 1985

Fisher Guide Fort Street Plant
6307 West Fort Street
Detroit, MI 48209
Attn: Melvin Gilmer, Jr.
Plant Engineering

RE: MID 005356787

Dear Mr. Gilmer:

This letter is to acknowledge receipt of your letter dated June 14, 1985, indicating your compliance program for RCRA deficiencies cited during my inspection on May 29, 1985. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth L. Damrel".

Kenneth L. Damrel
Environmental Engineer
HAZARDOUS WASTE DIVISION

KD:jg

cc: U.S. EPA, Region V
B. Okwumabua

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

XXXXXXXXXXXXXXXXXXXX

Gordon E. Guyer, Director
Waste Management Division
505 W. Main
Northville, MI 48167

June 11, 1987

RECEIVED
JUN 15 1987
U.S. EPA REGION V
SOUTH WASTE DIVISION

NATURAL RESOURCES COMMISSION
JAMES J. ANDERSON
MARLENE J. FLUHARTY
STEPHEN V. MONSMA
O. STEWART MYERS
DAVID D. DLSDN
RAYMOND POUPORE
HARRY H. WHITELEY

Fisher Guide Division
General Motors Corp.
6307 W. Fort St.
Detroit, MI 48209-2975
ATTN: Michael Melekian
Environmental Engineer

RE: MID 005356787

Dear Mr. Melekian,

On June 1, 1987, an inspection was conducted at your facility located at 6307 W. Fort St., Detroit, MI. The purpose of the inspection was to evaluate compliance of that facility with the F-Solvent Land Disposal restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirement:

1. For each shipment of restricted waste (F001-F005), the facility had not notified the treatment facility (recyclers) in writing of the appropriate treatment standard. The notice must include the following:
 - (i) The EPA waste number.
 - (ii) Applicable treatment standard.
 - (iii) Manifest number
 - (iv) Waste analysis, if available. 40 CFR 268.7 (a) (1).
You may include this notice on the uniform hazardous waste manifest document, additional comment area (J).

We request your response by July 10, 1987 documenting your corrective actions to these violations. If you have any questions, contact me at (313) 344-4670.

Sincerely,
Faye Dade

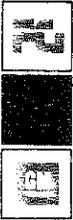
Faye Dade
Environmental Quality Analyst

FD: bs
Enclosure
cc: B. Okwumabua
EPA, Region V



Fisher Guide Division 5307 West Fort Street
General Motors Corporation Detroit, Michigan 48209 2975

Fort Street Plant



RECEIVED
JUN 19 1985
HAZARDOUS WASTE DIV

June 14, 1985

Mr. Damrel
Michigan Department of Natural Resources
Hazardous Waste Division
15500 Sheldon Road
Northville, MI 48167

Dear Mr. Damrel:

In response to your May 30, 1985 letter citing our plant's Hazardous Waste Management Practices with violations according to RCRA, we submit the following corrective actions and documentation:

1. Accumulation dates on some hazardous waste drums which you noted as faded due to weather have been corrected and an inter-plant communication distributed to plant departments to use only specified indelible markers for label inscriptions. This notice is attached.
2. The five drums which you noted as exceeding our 90 day storage limitation have been hauled away for proper disposal as documented by attached manifest #NY A 162785 7.
3. Records of training from 1985 annual training reviews have been reconstructed as documentation for this year's training has been misplaced.

I trust that the corrective actions taken and the documentation provided is adequate. If you have any questions regarding this matter, please feel free to contact me at (313) 554-7010.

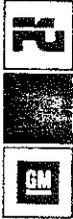
Sincerely,


Melvin A. Gilmer
Environmental Engineer

MAG:vmf

Attachment

cc: H. Jenkins
J. Reynolds
R. Tessier

Fort Street Plant Inter-Organization

Date: June 13, 1985

Subject: Sanford "Sharpie" Indelible Markers

To: M. Aubin, D. Daniels, R. Diber, F. Hancz, L. Manley,
J. Marine, C. Melekiancc T. Connell, G. Gallanis, M. Gilmer, K. Krolczyk, P. Pizzurro,
D. Snell, R. Tessier

On May 29, 1985 a representative of the United States Environmental Protection Agency (USEPA) and a representative from the Michigan Department of Natural Resources (MDNR) performed an impromptu inspection of our plant to evaluate our compliance with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA).

This inspection revealed that we were in violation of RCRA provisions 40 CFR 262.34(a)2, which addresses accumulation dates on waste containers not being clearly visible. We have determined that this lack of visibility was due to labels fading from weather exposure. This letter is intended to be a reminder to all plant personnel responsible for waste drum labeling that only "Sharpie" indelible markers are to be used to fill in information on waste labels.

We have made subject markers a stock item to be readily accessed through stock item #0511-3527.

Particular attention should be paid by plant activities which generate disposable waste such as:

- Maintenance and Sanitation - Waste oil and grease
- Production Engineering - Waste MDI and Polyols
- Dept. 1 Machine Operations - Waste oils and lubricants
- Dept. 5 - Waste hydraulic fluids and glues
- Dept. 6 - Waste oils, lubricants and sealants
- Dept. 7 Paint Operations - Waste paint flush, filters, thinners and sludge.
- Dept. 8 Foam Operations - Waste methylene chloride, Diisooctyl phthalate, and dimethyl formamides

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Form Approved. OMB No. 2000-0404. Expires 7-31-86

Please print or type.

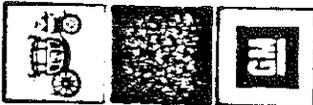
In case of emergency or spill, immediately call the National Response Center (800) 424-8802 and the N.Y. Department of Transportation (518) 457-7362.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded area is not required by Federal Law.	
		MID 005356787		00023					
3. Generator's Name and Mailing Address						A. State Manifest Document No.			
FISHER-GUIDE DIVISION OF GMC DETROIT-FORT ST. PLANT 6307 W. FORT ST. DETROIT MI 48209						NYA 162785 7			
4. Generator's Phone (313) 554 7027						B. State generator's ID			
5. Transporter 1 (Company Name)						C. State Transporter's ID			
KID INDUSTRIAL SERVICES, INC									
6. US EPA ID Number						D. Transporter's Phone (313) 729-3350			
MID 072790710									
7. Transporter 2 (Company Name)						E. State Transporter's ID			
FRONTIER CHEMICAL									
8. US EPA ID Number						F. Transporter's Phone (716) 295-8208			
NYD 043815703									
9. Designated Facility Name and Site Address						G. State Facility's ID			
FRONTIER CHEMICAL INC. 4626 ROYAL AVENUE NIAGARA FALLS N.Y. 14303									
10. US EPA ID Number						H. Facility's Phone (716) 295 8208			
NYD 043815703									
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers		13. Total Quantity		14. Unit	
				No. Type		Wt/Vol		Waste No.	
a. WASTE Paint Flush, Flammable liquid, UN 1993				065 DM		3575 G		D001	
b. Waste Methylene Chloride mixture, ORM-A, UN 1593				008 DM		440 G		F002	
c.									
d.									
J. Additional Descriptions for Materials listed Above						K. Handling Codes for Wastes Listed Above			
a.						a <input type="checkbox"/> c <input type="checkbox"/>			
b.						b <input type="checkbox"/> d <input type="checkbox"/>			
15. Special Handling Instructions and Additional Information									
Keep away from all sources of heat or flame. Avoid all fumes and vapors. If spilled, dam liquids from sewers, absorb with clay, and dispose of spill-absorbent mixture in accordance with RCRA guidelines.									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and state laws and regulations.									
Printed/Typed Name						Signature		DATE	
HELVIN A GILMER						[Signature]		06/13/85	
17. Transporter 1 (Acknowledgement of Receipt of Materials)						Signature		DATE	
Printed/Typed Name						Signature		DATE	
18. Transporter 2 (Acknowledgement or Receipt of Materials)						Signature		DATE	
Printed/Typed Name						Signature		DATE	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name						Signature		DATE	

GENERATOR

TRANSPORTER

FACILITY



Fisher Body
DIVISION OF GENERAL MOTORS CORPORATION

DETROIT FORT STREET PLANT
HAZARDOUS WASTE MANAGEMENT PROCEDURES
PERSONNEL TRAINING LOG

Maintenance Of This Document Fulfills The Requirements
Of The Code Of Federal Regulations--Title 40 Section 265.16 (d)

Employee Name	Badge Number	Job Title	Date of Initial Training	Job Description	Date of Annual Review	Training Covered
G. Trotter	33-1003	STOCK CLEAN	10-18-83	APPROX DRUMS SPECIFICALLY #14- #15	1-31-85	HAZARDOUS WASTE MANAGEMENT
C. Stream	30-1667	HI-LO DRIVER	"	TRANSPORT HAZ. WASTE DRUMS	1-31-85	HAZARDOUS WASTE MANAGEMENT
G. Eatman	30-1579	HI-LO DRIVER	1-31-85	TRANSPORT HAZ. WASTE DRUMS		HAZARDOUS WASTE MANAGEMENT
G. Donnelly	8-556	Jobsetter	10-18-83	HAZ. WASTE DRUM COLLECTION	1-31-85	HAZARDOUS WASTE MANAGEMENT
E. Lee	8-1047	"	"	HAZ. WASTE DRUM COLLECTION	1-31-85	HAZARDOUS WASTE MANAGEMENT
T. Pangle	7-1675	Painter	10-18-83	HAZ. WASTE DRUM COLLECTION	1-31-85	HAZARDOUS WASTE MANAGEMENT
L. Bakj	7-2298	Painter	1-31-85	HAZ. WASTE DRUM COLLECTION		HAZARDOUS WASTE MANAGEMENT
Z. Howe	7-2562	SOLUTION ATTACHMENT	10-18-83	HAZ. WASTE DRUM COLLECTION		HAZARDOUS WASTE MANAGEMENT
C. Agius	34-765	CLEAN EQUIPMENT	10-18-83	HAZ. WASTE DRUM COLLECTION	1-31-85	HAZARDOUS WASTE MANAGEMENT

Maintained by: MELVIN GILMER

STATE OF MICHIGAN



Hazardous Waste Division
15500 Sheldon Road
Northville, Michigan 48167

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E. R. CAROLLO
MARLENE J. FLUHARTY
STEPHEN F. MONSMA
O. STEWART MYERS
RAYMOND POUPORE
HARRY H. WHITELEY

May 30, 1985

Fisher Guide Fort Street Plant
6307 West Fort Street
Detroit, Michigan 48209
Attention: Melvin Gilmer, Jr., Plant Engineering

RE: MID 005356787

Dear Mr. Gilmer:

On May 29, 1985, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 6307 West Fort Street, Detroit, Michigan. The purpose of this inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of subtitle (c) of RCRA. Specifically, the following was found:

1. The date that accumulation began was not visible on some drums as required by 40 CFR 262.34(a)2. This may have been due to the labels fading due to weathering.
2. Five drums were accumulated for more than 90 days. You are limited to a 90 day accumulation time as required by 40 CFR 262.34(a).
3. Records of training documenting the 1985 annual review of training as required by 40 CFR 265.16(c) were not available for review during the inspection.



Mr. Melvin Gilmer, Jr.

May 30, 1985

Page 2

You are requested to respond to this letter by June 21, 1985 providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

Kenneth L. Damrel

Kenneth L. Damrel
Environmental Engineer
Hazardous Waste Division
(313) 459-9180

KLD/sc

cc: U.S. EPA, Region V ✓

B. Okwumabua

RCRA Inspection Report

EPA Identification Number: MI D 005356787

Installation Name: Fisher Guide Fort Street Plant

Location Address: 6307 West Fort Street

City: Detroit State: MI 48209

Date of inspection: 5-29-85 Time of inspection (from) 11:30 (to) 1:30

Person(s) interviewed	Title	Telephone
<u>Melvin A. Gilmer, Jr.</u>	<u>Sr. Engineer</u>	<u>313-554-7010</u>
_____	_____	_____
_____	_____	_____

Inspector(s)	Agency/Title	Telephone
<u>Kenneth L. Damrel</u>	<u>MDNR/HWD/Env. Eng.</u>	<u>313-459-9180</u>
<u>Andrea Schoenrock</u>	<u>MDNR/HWD/Gen. Eng.</u>	<u>313-373-2730</u>

Installation Activity (mark only one box)

Inspection Form(s)

- | | |
|--|------|
| <input type="checkbox"/> Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation | A |
| <input type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation) | A |
| <input type="checkbox"/> Generation and Transportation | B, C |
| <input checked="" type="checkbox"/> Generation only | B |
| <input type="checkbox"/> Transportation only | C |

INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.				2 hazardous 10 non hazardous
(3) Do the manifest forms examined contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements) 262.21	<input checked="" type="checkbox"/>			
a. Manifest document number?	<input checked="" type="checkbox"/>			
b. Name, mailing address, telephone number, and EPA ID number of generator?	<input checked="" type="checkbox"/>			
c. Name and EPA ID number of transporter(s)?	<input checked="" type="checkbox"/>			
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>			
g. Required certification?	<input checked="" type="checkbox"/>			
h. Required signatures?	<input checked="" type="checkbox"/>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>				see remarks #1
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>0</u>				

Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	✓	—	—	_____
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32	✓	—	—	_____
(3) If required, are placards available to transporter? 262.33	—	✓	—	<u>Rely on transporter</u>

** (4) Pre-shipment Accumulation:

** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.

a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	✓	—	—	_____
i. Is each container clearly marked with the date on which the period of accumulation began?	—	✓	—	<u>Some labels are faded</u>
ii. Have more than 90 days elapsed since the dates marked?	✓	—	—	<u>About 5 containers</u>
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"	✓	—	—	_____
iv. Are containers in good condition?	✓	—	—	_____
v. Are containers compatible with waste in them?	✓	—	—	_____
vi. Are containers managed to prevent leaks?	✓	—	—	_____
vii. Are containers stored closed?	✓	—	—	_____
viii. Are containers inspected weekly for leaks and defects?	✓	—	—	_____
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	✓	—	—	<u>ignitable</u>

	Yes	No	NI	Remarks
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)			✓	no incompatible
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			✓	
b. Is hazardous waste accumulated in tanks? If no, skip to c. 262.34 (January 11, 1982 revision)		✓		
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 262.34 (January 1982 revision)				
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192				
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
iv. Do continuous feed systems have a waste-feed cutoff?				
v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193				
vi. Are required daily and weekly inspections done? 265.194				
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198				
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199			✓	

Yes No NI Remarks

ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

c. Is hazardous waste accumulated in other than tanks or containers? _____ ✓ _____

d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

- | | | | | |
|---|---|-------|-------|--------------------------|
| i. Job Titles? | ✓ | _____ | _____ | _____ |
| ii. Job Descriptions? | ✓ | _____ | _____ | _____ |
| iii. Description of training? | ✓ | _____ | _____ | _____ |
| iv. Records of training? | ✓ | _____ | _____ | _____ |
| v. Did personnel receive the required training by 5-19-81? | ✓ | _____ | _____ | _____ |
| vi. Do new personnel receive required training within six months? | ✓ | _____ | _____ | _____ |
| vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training? | ✓ | _____ | _____ | Not available for review |

e. Preparedness and Prevention 265. Subpart C

i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31

_____ ✓ _____

	Yes	No	NI	Remarks
ii. If required, does this facility have the following equipment: 265.32				
Internal communications or alarm systems?	✓	—	—	—
Telephone or 2-way Radios at the scene of operations?	✓	—	—	—
Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓	—	—	—

Indicate the volume of water and/or foam available for fire control:

1 Portable fire extinguisher in storage area,
Fire hoses

iii. Testing and Maintenance of Emergency Equipment: 265.33				
Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓	—	—	—
Is emergency equipment maintained in operable condition?	✓	—	—	—
iv. Has owner/operator provided immediate access to internal alarms (if needed)?	✓	—	—	—
v. Is there adequate aisle space for unobstructed movement?	—	✓	—	See remarks #4
vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	✓	—	—	—

f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:

i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52	✓	—	—	—
--	---	---	---	---

	Yes	No	NI	Remarks
ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	✓			
iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	✓			
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	✓			
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)	✓			
vi. Are copies of the Contingency Plan available at site and local emergency organizations?	✓			
vii. Is the facility emergency coordinator identified?	✓			
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?			✓	none occurred

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	Yes	No	NI	Remarks
(1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)
262.50

(1) Has the installation imported or exported hazardous waste? If "no", skip a and b.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
a. Exporting Hazardous Waste, has a generator:				
i. Notified the Administrator in writing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. Met the Manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Importing Hazardous Waste, has the generator met the manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Remarks: 1) Manifest # MI 0548307

Non hazardous shipped 4-12-85

no generator 2nd copy on file

2) 5 drums over 90 days

3) Some Labels not legible

4) adequate aisle space was not maintained due to the drums being moved out of the normal storage area to facilitate closure of the area as an interim status storage area.

The facility will again use the area, but as a generator storage area (less than 90 days) once the cleaning of the storage area is complete.

yes
4-26-83
Code 0

EPA #1480

STATE OF MICHIGAN



WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
HOWARD A. TANNER, Director

Hazardous Waste Division
Detroit Area
9311 Groh Road
Grosse Ile, Michigan 48138

NATURAL RESOURCES COMMISSION

- JACOB A. HOEFER
- E. M. LAITALA
- HILARY F. SNELL
- PAUL H. WENDLER
- HARRY H. WHITELEY
- JOAN L. WOLFE
- CHARLES G. YOUNGLOVE

RECEIVED
MAR 22 1983
EPA-FIELD STAFF

March 16, 1983

Mr. Mel Gilmer
Environmental Engineer
GMC-Fisher Body Fort Street Plant
6307 W. Fort Street
Detroit, Michigan 48209

Re: MID 005356787

Dear Mr. Gilmer:

On March 9, 1983, the Fort Street Plant was inspected to determine compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended. General Motors notified the U.S.E.P.A. in November 1980 that the plant generated hazardous waste and was subject to the Act.

No violations of RCRA were found during the inspection. I do recommend that the security personnel use the new inspection and inventory forms.

Thank you for your cooperation. Feel free to contact me at (313) 675-0860 if you have any questions concerning hazardous waste.

Sincerely,

William E. Stone

William E. Stone
Water Quality Specialist
Compliance Section
Hazardous Waste Division

WES/sc

cc: Ken Burda (3)

QES 4-26-83
Code 0

1480

ie 836
Mel Gilmer

RCRA Inspection Report

EPA Identification Number: M I D 0 0 5 3 5 6 7 8 7

Installation Name: GMC - Fisherbody Fort St. Plt.

Location Address: 6307 W. Fort St.

City: Detroit State: Mi. 48209

Date of inspection: 3/9/83 Time of inspection (from) 10:30a (to) 12:30p

Person(s) interviewed	Title	Telephone
<u>Mel Gilmer</u>	<u>Environmental Engineer</u>	<u>(313) 554-6836</u> <u>7010</u>
_____	_____	_____
_____	_____	_____

Inspector(s)	Agency/Title	Telephone
<u>William E. Stone</u>	<u>Mi. DNR-HWD/WGS</u>	<u>(313)-675-0860</u>
_____	_____	_____

Installation Activity (mark only one box) Inspection Form(s)

- Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation A
- Treatment/Storage/Disposal (no generation or Transportation) A
- Generation and Transportation B, C
- Generation only B
- Transportation only C

The plant manufactures exterior and interior trim used at the Fleetwood Plant in the assembly of Cadillac Bodies.

The attached sheet describes the waste types and amounts.

It was indicated that wastes are not stored beyond 90 days.

Fisherbody Fort St.

Waste Description	Process Origin	Hazardous Class	DOT I.D. Number	EPA Number	DNR Number	Handling Code	Approx. Pounds/Yr.
Waste Silicone Liquid	Dept. 8 Foam Tryout	Combustible Liquid	NA 1993	None	None	S01	500
Waste Methylene Chloride Mixture	Dept. 8 Foam Flush	ORM-A	UN 1513	F002	F002	S01	110,000
Waste Paint Sludge, N. O. S.	Dept. 7 Paint Spray	--	--	--	001D 003D	S01	220,000
Waste Nickel Sulfate Mixture	Spent Plater Soln. Sludge	ORM-E	NA 9141	--	004L	S01	2,100
Waste Polyol Liquid	Dept. 8 Foam Tryout	--	--	--	016L	S01	4,200
Waste Potassium Hydroxide Solution	Dept. 7 Stripper Sludge	Corrosive Material	UN 1814	D002	D002	S01	4,200
Waste Lead Chromate Mixture	Spent Plater Soln. Sludge	Corrosive Material	UN 1759	--	004L R007 D008	S01	2,500
Compound Paint Reducing Liquid	Dept. 7 Paint Gun Flush	Combustible Liquid	NA 1142	D001	D001	S01	14,000
Hazardous Waste Oil Liquid, N.O. S.	Dept. 1 Blanker Drain	ORM-E	NA 9189	D008	020R	S02	15,000* Undergone Tank
Waste Oil	Plant Waste Oil	Combustible Liquid	NA 1270	D001	007L	S01	1,000
Dimethyl Formamide Mixture	Dept. 8 Foam Gun Cleaner	Combustible Liquid	UN 2265	--	006L	S01	500
Waste Toluene Diisocyanate	Dept. 8 Foam	Poison B	UN 2078	U223	U223	S01	2,000

R+D High Vol High Vol 1/yr R+D sell sell

MAG:vm *This waste must be sold for reclaim.

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR-265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
DB0	<input type="checkbox"/>	disposal in landfill	N,F
T03-	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

None

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

The 1981 revision is correct in showing only S01 and there are no exclusions

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	___	___	___	<u>NA</u>
b. Facility expansion?	___	___	___	<u>NA</u>
c. Change of owner or operator?	___	___	___	<u>NA</u>
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	___	___	
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>	___	___	
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	___	___	___	<u>N.A.</u>
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	<u>X</u>	___	___	
or				
b. i. Artificial or natural barrier around facility?	<u>X</u>	___	___	
and				
ii. Controlled entry?	<u>X</u>	___	___	
c. Danger sign(s) at entrance?	<u>X</u>	___	___	
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<u>X</u>	___	___	

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
ii. safety and emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Fire & safety Dept.
iii. security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	security
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	weekly
d. Are areas subject to spills inspected daily when in use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	logged weekly
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Time is req. by form but is not always noted
ii. the name of the inspector?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. a notation of the observations made?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	there is a space for this
iv. the date and nature of any repairs or remedial actions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	"
5. Do personnel training records include: 265.16				
a. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel file

	YES	NO	NI	Remarks
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Did facility personnel receive the required training by 5-19-81?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
f. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>no new personnel</i>
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation of Facility: 265.31

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

YES	NO	NI	Remarks
—	X	—	_____

2. If required, does the facility have the following equipment: 265.32

a. Internal communications or alarm systems?

X	—	—	_____
---	---	---	-------

b. Telephone or 2-way radios at the scene of operations?

X	—	—	_____
---	---	---	-------

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X	—	—	_____
---	---	---	-------

Indicate the volume of water and/or foam available for fire control:

3. Testing and Maintenance of Emergency Equipment: 265.33

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

X	—	—	_____
---	---	---	-------

b. Is emergency equipment maintained in operable condition?

X	—	—	_____
---	---	---	-------

4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34

X	—	—	_____
---	---	---	-------

5. Is there adequate aisle space for unobstructed movement?

X	—	—	_____
---	---	---	-------

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

X	—	—	_____
---	---	---	-------

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

YES NO NI Remarks

3. Emergency Coordinator 265.55

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
- c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

NA

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	_____	_____	_____	_____
b. Are records of past shipments retained for 3 years?	_____	_____	_____	_____
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	_____	_____	_____	_____
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	<u>X</u>	_____	_____	_____
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	<u>X</u>	_____	_____	<u>inventory</u> <u>only recently developed</u>
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	<u>X</u>	_____	_____	_____
***iii. A map or diagram of each cell or disposal area	_____	_____	_____	_____

*** only applies to disposal facilities

	YES	NO	NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	—	—	—	NA
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X	—	—	
v. Reports detailing all incidents that required implementation of the Contingency Plan?	—	—	—	NA
vi. All closure and post closure costs as applicable?	X	—	—	
4. Availability of Records 265.74				
Are all facility records required under 40 CFR Part 265 available for inspection?	X	—	—	
5.**Unmanifested Waste Reports 265.76				
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?	—	—	—	
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.	—	—	—	

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

	YES	NO	NI	Remarks
1. Has the owner or operator of the facility implemented a groundwater monitoring system? 265.90	_____	_____	_____	_____
If "no", Skip to number 11.				
2. Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)?	_____	_____	_____	_____
If "yes", skip to number 12. If "no", continue				
3. Does the groundwater monitoring system meet the following requirements of 265.91:				
a. At least one well installed hydraulically up-gradient from the limit of the waste management area?	_____	_____	_____	_____
Indicate the total number of up-gradient wells.				
b. At least three wells installed hydraulically down-gradient at the limit of the waste management area?	_____	_____	_____	_____
Indicate the total number of downgradient wells.				
c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?	_____	_____	_____	_____

Sketch the locations of the wells relative to the waste management area.

	YES	NO	NI	Remarks
d. Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?	---	---	---	_____
4. Has the owner or operator developed a written groundwater sampling and analysis plan that includes procedures and techniques for: 265.92				
a. Sample collection?	---	---	---	_____
b. Sample preservation and shipment?	---	---	---	_____
c. Analytical procedures?	---	---	---	_____
d. Chain of custody control?	---	---	---	_____
5. Does the owner or operator follow his groundwater sampling and analysis plan?	---	---	---	_____
6. Is the groundwater sampling and analysis plan maintained at the facility?	---	---	---	_____
7. Has the owner or operator determined the concentration or value of all the groundwater monitoring parameters of 265.92(b) in accordance with paragraphs c and d of 265.92?	---	---	---	_____

	YES	NO	NI	Remarks
8. Has the owner or operator developed an <u>outline</u> of a comprehensive groundwater quality assesment program that is capable of determining: 262.93				
a. Whether hazardous waste or hazardous waste constituents have entered the groundwater?	---	---	---	_____
b. The rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater?	---	---	---	_____
c. The concentration of hazardous waste or hazardous waste constituents in the groundwater?	---	---	---	_____
*9. Has the owner or operator performed a statistical analysis of his groundwater monitoring data as required in 265.93(b)?	---	---	X	_____
*10. Was there a statistically significant increase (or pH decrease) detected in any well?	---	---	X	_____
a. If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?	---	---	X	_____
Skip to number 14				
11. Has the owner or operator prepared a written groundwater monitoring waiver demonstration for the facility?	---	---	---	_____
a. Is the waiver demonstration maintained at the facility?	---	---	---	_____
b. Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?	---	---	---	_____
Note: Inspectors should request a copy of the waiver document.				
c. Skip questions 12, 13, and 14.				

*These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

	YES	NO	NI	Remarks
12. Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?	---	---	---	_____
a. Has the plan been certified by a qualified geologist or geotechnical engineer?	---	---	---	_____
Note: If the plan for an alternate groundwater monitoring system was not submitted to the Regional Administrator the inspector should request a copy for review.				
13. Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?	---	---	---	_____
14. Does the owner or operator submit reports and maintain records as required in 265.94?	---	---	---	_____

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
ii. maximum hazardous waste inventory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. estimated year of closure?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA
v. schedule of closure activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
*2. Post-Closure 265.118				
a. Is the post-closure plan available for inspection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
BB. facility monitoring equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. name, address, and phone number of person or office to contact during post-closure care period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Has the post-closure period begun?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is the written post-closure cost estimate available? 265.144	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Applies only to disposal facilities.

Section I - U AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>purchased public road adjacent to HWMF</i>
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section J - TANKS (Part 265, Subpart J)

	YES	NO	NI	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	---	---	---	_____
2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?	---	---	---	_____
3. Do continuous feed systems have a waste-feed cutoff?	---	---	---	_____
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193	---	---	---	_____
5. Are required daily and weekly inspections done? 265.194	---	---	---	_____
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.198	---	---	---	_____
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.199	---	---	---	_____
8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?				

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Section K - SURFACE IMPOUNDMENTS (Part 265, Subpart K)

	YES	NO	NI	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222	—	—	—	—
2. Do earthen dikes have protective covers? 265.224	—	—	—	—
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225	—	—	—	—
4. Is the freeboard level inspected at least daily? 265.226	—	—	—	—
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	—	—	—	—
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229	—	—	—	—
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230	—	—	—	—

Section L - WASTE PILES (40 CFR Part 265, Subpart L)

	YES	NO	NI	Remarks
1. Are waste piles covered or protected from dispersal by wind? 265.251	---	---	---	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	---	---	---	_____
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253	---	---	---	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256	---	---	---	_____
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257	---	---	---	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	_____

Section M - LAND TREATMENT (Part 265, Subpart M)

	YES	NO	NI	Remarks
1. Is treated hazardous waste capable of biological or chemical degradation? 265.270	_____	_____	_____	_____
2. Are run-off and run-on diverted from the facility or collected	_____	_____	_____	_____
3. Is waste analyzed according to 265.273?	_____	_____	_____	_____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	_____	_____	_____	_____
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278	_____	_____	_____	_____
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	_____	_____	_____	_____
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279	_____	_____	_____	_____
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281	_____	_____	_____	_____
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282	_____	_____	_____	_____

Section N - LANDFILLS (Part 265, subpart N)

YES ND NI Remarks

1. General Operating Requirements 265.3D2
Does the facility provide the following:

a. Diversion of run-on away from active portions of the fill?

b. Collection of run-off from active portions of the fill?

c. Is collected run off treated?

d. Control of wind dispersal of hazardous waste?

2. Surveying and Recordkeeping 265.309
Does the Operating Record Include:

a. A map showing the exact location and dimensions of each cell?

b. The contents of each cell and the location of each hazardous waste type within each cell?

3. Special requirements for ignitable or reactive waste. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? (Indicate if waste is ignitable or reactive.) 265.312

4. Special Requirements for Incompatible Wastes. 265.313

Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

YES NO NI Remarks

5. Special requirements for liquid waste
265.314

a. Are bulk or non-containerized liquids placed in the landfill? If "yes," complete items i, ii, and iii.

i. Does the landfill have a chemically and physically resistant liner system?

ii. Does the landfill have a functional leachate collection system?

iii. Are free liquids stabilized prior to or immediately after placement in the landfill?

b. Have containers holding free liquids been placed in landfill since March 22, 1982?

6. Special requirements for Containers
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?
265.315

Section O/P - INCINERATION AND THERMAL TREATMENT (40 CFR Part 265, Subparts O and P)

1. Determination of Steady State

I=incinerator T=thermal

a. Type of unit (i.e., type of incinerator or thermal treatment): _____

b. Components and steady state condition: I 265.343 T 265.373

Was each component at steady state prior to adding waste?

Component	YES	NO	NI	Remarks
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

2. Waste Analysis

I 265.345

T 265.375

a. Minimum requirements, for wastes not previously burned/treated.

i. Required analyses; has an analysis been performed for the following?

Heating value _____

Halogen content _____

Sulfur content _____

ii. Has documented or written data been substituted for analysis of either:

Lead? _____

Mercury: _____

b. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

		YES	NO	NI	Remarks
3.	<u>Monitoring and Inspections</u> I 265.347 T 265.37				
a.	Are combustion/emission control instruments monitored at least every 15 minutes?	---	---	---	_____
b.	Is steady state maintained or corrections attempted?	---	---	---	_____
c.	Is stack plume observed at least hourly for normal color and opacity?	---	---	---	_____
d.	Did any stack observations made by owner or operator show a plume different than normal? **	---	---	---	_____
e.	If "yes" to (d) above, were corrections made to return emissions to normal appearance? **	---	---	---	_____
f.	Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	---	---	---	_____
**Specify in Remarks for what period of time this was checked.					
g.	Are emergency shutdown controls and system alarms checked daily for proper operation?	---	---	---	_____

4. Open Burning T 265.382 (open burning does not apply to incineration)

a.	Only complete this part if the facility open burns hazardous waste.				
i.	Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned).	---	---	---	_____

YES NO NI Remarks

ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

	YES	NO	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	_____	_____	_____	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	_____	_____	_____	_____
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.4D	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.		<u>3</u>		<u>see attached</u>
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DDT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>0 - none</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>NA</u>				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

	YES	NO	N ₁	Remarks
i. Notified the Administrator in writing?				
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii. Met the Manifest requirements?				
b. Importing Hazardous Waste; has the generator met the manifest requirements?				

Appendix TR

Section A: SCOPE:

1. Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.
2. Does the transporter transport hazardous waste into the U.S. from abroad?
3. Does the transporter transport hazardous waste out from the U.S.?
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?

YES	NO	NI	Remarks
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 263, Subpart B)

1. Are copies of completed manifests available for review and retained for three years. 263.22
2. Estimate the number of manifests for shipments completed during the past 6 months.
3. Examine a representative number of manifests. Indicate number examined.
4. Did transporter properly sign and date the manifests examined?
5. Do any manifests indicate shipments delivered to other than the designated facility? 263.21
If (5) is "no," skip 6 and 7.
6. Do any manifests indicate shipments delivered to other than an alternate facility?
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____



MID005356787

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
CARL T. JOHNSON
T.M. LAITALA
LILARY F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director
Hazardous Waste Division
Detroit Area
9311 Groh Road
Grosse Ile, Michigan 48138

(TSD, G)

EPA

#961

YES
2/23/83

January 5, 1983

Mr. Richard Chadbourne
Plant Engineer
GMC Fisher Body/Fort Street Plant
6307 West Fort Street
Detroit, Michigan 48209

Re: RCRA Compliance
MID005356787

TSD/G

Dear Mr. Chadbourne:

Thank you for your letter of October 25, 1982, documenting the steps taken at your facility to correct items of non-compliance cited during our September inspection. It appears to address all points of our September 28 letter sufficiently. We appreciate your prompt cooperation in this matter.

Yours truly,

HAZARDOUS WASTE MANAGEMENT DIVISION

Kenneth Burda, P.E.
District Engineer

Susan Norton
Susan Norton
Water Quality Specialist

KB:SN/sc

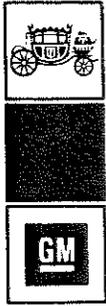
cc: HWMD (2)

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JAN 06 1983

ACT 64





Fisher Body

Division of General Motors Corporation

221 704
Detroit Fort Street Plant

6307 West Fort Street

Detroit, Michigan 48209

October 25, 1982

RECEIVED

OCT 27 1982

WATER QUALITY DIV.
DIST. I

Ms. Susan Norton
Water Quality Specialist
Department of Natural Resources
9311 Groh Road
Grosse Ile, MI 48138

Dear Ms. Norton:

RE: RCRA COMPLIANCE MI D005356787

This letter is in response to your letter dated September 28, 1982 citing our facility as being in violation of certain sections of the RCRA. Outlined below is a detailed explanation of the actions and/or plans we have taken to assure compliance.

1. Cited violation of 40CFR 265.13 (b).

A detailed waste analysis plan has been implemented.

2. Cited violation of 40CFR 265.14 (c).

"Danger" signs for posting at the entrance to the Hazardous Waste Storage area have been ordered. Arrival is expected by mid-November with posting no later than one week after delivery.

3. Cited violation of 40CFR 265.15 (d).

A revised inspection log has been issued to record inspection time in addition to other requirements.

4. Cited violation 40CFR 265.16 (c).

Record keeping has been revised to reflect annual training review dates for personnel handling hazardous waste. In addition, employees requiring an annual review have been identified and retraining scheduled.

5. Cited violation of 40CFR 265.14⁷ (a).

"No Smoking" signs have been ordered with targeted posting as outlined in Item 2.

6. Cited violation of 40CFR 265.52 (d).

Incorporation of title "Emergency Coordinator" will be incorporated into spill prevention control and counter measure plan and the revision incorporating this change will be completed November 5, 1982.

7. Cited violation of 40CFR 265.73.

Operating records have been established.

8. Cited violation of 40CFR 265.74.

As items 1, 3, and 7 are complete, this item is also complete.

9. Cited violation of 40CFR 265.176.

Work is currently in progress for relocation of waste storage area so as not to be within 50 feet of property line. Completion is planned for November 15, 1982.

As per our conversation on September 10, 1982, a revised Part A application had been prepared and submitted to Region #5 with your recommended changes already included.

Should you have any questions, please don't hesitate to contact our office at (313) 554-6839.

Sincerely,


R. D. Chadbourne
Plant Engineer

MAG:vm

cc: J. B. Eisenlord
M. A. Gilmer
J. J. Reynolds

STATE OF MICHIGAN

EPA



WILLIAM G. MILLIKEN, Governor

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
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CHARLES G. YOUNGLOVE

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director
Water Quality Division
9311 Groh Road
Grosse Ile, Michigan 48138

#961

September 28, 1982

CERTIFIED MAIL

Mr. Richard Chadbourne
Plant Engineer
GMC Fisher Body/Fort Street Plant
6307 West Fort Street
Detroit, Michigan 48209

Re: RCRA Compliance
MID005356787

Dear Mr. Chadbourne:

On September 10, 1982, Susan Norton of our office inspected the Fisher Body Fort Street Plant. The purpose of the visit was to determine compliance with the Resource Conservation and Recovery Act (RCRA), as amended. The inspection was conducted in the company of Mr. James Reynolds and Mr. Court Cardinal. As a result of the visit, it was determined that the facility is in violation of certain requirements, which are listed below. Sections of the law cited refer to the Code of Federal Regulations, (Title 40 CFR), revised on July 1, 1981.

1. A detailed waste analysis plan was not available for inspection. This is in violation of 40 CFR 265.13(b).
2. There were no "Danger" signs at the entrance to the hazardous waste storage area. 40 CFR 265.14(c) requires that a sign reading "Danger-Unauthorized Personnel Keep Out" be posted at each entrance to the active portion of the facility.
3. The inspection log, while in other aspects complete, did not have the time of each inspection recorded, as required by 40 CFR 265.15(d).
4. There was no indication that personnel handling hazardous waste have had an annual review of their initial training. This is contrary to the requirements of 40 CFR 265.16(c).
5. "No Smoking" signs were not posted at the hazardous waste storage area, in violation of 40 CFR 265.17(a).

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SEP 30 1982

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Mr. Richard Chadbourne
September 28, 1982
Page 2

6. Since the facility's Spill Prevention, Control and Counter-measure Plan is used to cover all materials at the plant, it was evaluated as a hazardous waste Contingency Plan. Although seven (7) individuals are listed as "responsible for spill prevention and control", they are not formally identified as Emergency Coordinators, as required by 40 CFR 265.52(d). The addresses of the primary Emergency Coordinator and his alternates must be listed also.
7. There was no Operating Record kept at the facility. This is in violation of 40 CFR 265.73.
8. As a result of Items 1, 3, and 7, not all facility records were available for review during the inspection. This is contrary to the provisions of 40 CFR 265.74(a).
9. The present facility arrangement has ignitable waste stored less than fifty (50) feet from the facility property line. This is in violation of 40 CFR 265.176.

In addition to the deficiencies cited above, the inspection also indicated that some of the listings of hazardous waste under Item IV of your Part A Permit Application may be incorrectly described or unnecessarily listed. We suggest that the listing of ignitable bottom sludge from the underground storage tank be changed from F017 to D001. This would identify its ignitable properties, which bring it into regulation. The regulation of paint sludge per se, F017, has been deferred pending further evaluation by U.S.E.P.A.

We believe items 7, 8, 9, 11, 12 and 13 listed under Item IV should also be re-evaluated. Because no cyanides are used at the facility, there is some question as to whether these items actually come under RCRA regulation. We urge you to contact the U.S.E.P.A. Regional Administrator to clarify these points. His address is:

EPA Region V
RCRA Activities
P.O. Box A 3587
Chicago, Illinois 60690

Questions may also be directed to Mr. Joseph Boyle of U.S.E.P.A., at (312) 886-3754.

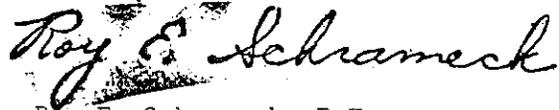
A copy of the RCRA inspection report is enclosed for your examination. We request that you respond to this office by letter no later than November 1, 1982, providing documentation of the actions you have taken to correct the

Mr. Richard Chadbourne
September 28, 1982
Page 3

deficiencies listed above. Should any change in identification of your waste materials occur, we would appreciate written notification. Please do not hesitate to contact our office at (313) 675-0860 should you have any questions. We appreciate the cooperation and assistance extended by your staff during the inspection.

Yours truly,

WATER QUALITY DIVISION



Roy E. Schrameck, P.E.
District Engineer



Susan Norton
Water Quality Specialist

RES:SN/sc

Enclosure

cc: Mr. Alan Howard, OHWM (2)
Mr. Court Cardinal
Mr. James Reynolds

3710 FISHER BODY FORT ST. PLA - MID 005 856797
OBTAINED DURING SEPT. 10, 1982 INSPECTION

MEM09 08 JUN 82 15:15

OUR PLANT RECEIVED A LETTER FROM THE EPA DATED 5-27-82, STATING THAT WE ARE SUBJECT TO GROUND WATER MONITORING.

6-8-82 JAMES REYNOLDS CALLED ^(USEPA) JAMES BROSSMAN. BROSSMAN STATED THAT HE WOULD DELETE US FROM THE LIST OF GROUND WATER MONITORING REQUIREMENTS, BASED ON THE INFORMATION REGARDING OUR REVISED EPA PERMIT.

WE SHOULD RECEIVE NOTIFICATION FROM EPA ON OR BEFORE 7-15-82 ON OUR REQUEST FOR THE EPA PERMIT REVISION DATED 12-81 AND SIGNED BY C. KATKO.

READY

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SEP 30 1982

ACT 64

#961

RCRA Inspection Report

EPA Identification Number: M I D 0 0 5 3 5 6 7 8 7

Installation Name: GMC FISHER BODY FORT STREET PLANT

Location Address: 6307 WEST FORT STREET

City: DETROIT State: MICHIGAN 148209

Date of inspection: SEPT. 10, 1982 Time of inspection (from) 1:21 P.M. (to) 4:50 P.M.

Person(s) interviewed	Title	Telephone
<u>MR. JAMES REYNOLDS</u>	<u>GENERAL SUPERVISOR, PLANT ENGINEER</u>	<u>313-554-6841</u>
<u>MR. COURT CARDINAL</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>313-554-6839</u>

Inspector(s)	Agency/Title	Telephone
<u>SUSAN HORTON</u>	<u>MICHIGAN DEPT. OF NATURAL RESOURCES WATER QUALITY DIVISION</u>	<u>313-675-0860</u>

Installation Activity (mark only one box) Inspection Form(s)

- Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation A
- Treatment/Storage/Disposal (no generation or Transportation) A
- Generation and Transportation B, C
- Generation only B
- Transportation only C

RECEIVED
SEP 30 1982

ACT 84

THE INSPECTION INDICATED THAT THE 502 (TANK STORAGE), 504 (SURFACE IMPOUNDMENT STORAGE), AND 701 (TANK TREATMENT) ITEMS LISTED ON THE FACILITY'S "PART A" ARE NOT ACTUALLY SUBJECT TO RCRA REGULATION. THE ONLY ACTUAL RCRA REGULATED WASTE IS IGNITABLE PAINT SLUDGE FROM AN UNDERGROUND STORAGE TANK, ~~AND~~ SPENT HALOGENATED SOLVENTS, AND SPENT NON-HALOGENATED SOLVENTS. THE FOLLOWING ITEMS WERE LISTED, AND WERE FOUND TO ACTUALLY BE OTHER THAN THE RCRA DEFINITIONS.

- FO10 - NO CYANIDES USED AT PLANT IN THIS HEAT TREAT OPERATION
- FO11 - SAME AS ABOVE
- FO07, FO08, FO09 - NO CYANIDES ARE USED IN THE PLATING OPERATIONS AT THE PLANT.

LETTER ORIGINAL & FORM TO MR. CHADBOURNE
 CC: MR. REYNOLDS
 MR. COURT CARDINAL - ENV. ENGINEER

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

- 1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- 2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input checked="" type="checkbox"/>	storage in tanks <i>-IN SIMPS PRIOR TO WWTP WASTE WATER TREATMENT TRANSFER TANKS.</i>	J
T01	<input type="checkbox"/>	treatment in tanks <i>-IS COINCIDENTAL TO WWTP OPERATIONS AND APPEARS NOT TO COME UNDER RCRA</i>	
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

- 3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
- 4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

SEE NOTE ON COVER SHEET

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
b. Facility expansion?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
c. Change of owner or operator?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u> </u>	<u> </u>	<u> </u>	<u>N/A SEE 2 (b).</u>
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
or				
b. i. Artificial or natural barrier around facility?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
and				
ii. Controlled entry?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c. Danger sign(s) at entrance?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	AREA IS INSPECTED DAILY & HOW OFTEN
c. If so, does the schedule address the inspection of the following items:				SCHEDULE PLAN REQUIRES WEEKLY WEEKLY CHECK.
i. monitoring equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SEE (6) ABOVE
ii. safety and emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Are areas subject to spills inspected daily when in use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
f. Does the inspection log contain the following information:				
i. the <u>date</u> and time of the inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TIME NOT RECORDED - ALWAYS DONE FIRST SHIFT SEE (6) ABOVE
ii. the name of the inspector?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. a notation of the observations made?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. the date and nature of any repairs or remedial actions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Do personnel training records include: 265.16				
a. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	YES	NO	NI	Remarks
c. Description of training?	<u>X</u>	—	—	_____
d. Records of training?	<u>X</u>	—	—	_____
e. Did facility personnel receive the required training by 5-19-81?	<u>X</u>	—	—	_____
f. Do new personnel receive required training within six months?	—	—	—	N/A - NO NEW HIRES AT THIS PLANT SINCE 1976.
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	—	<u>X</u>	—	_____
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<u>X</u>	—	—	_____
b. No smoking signs?	—	<u>X</u>	—	_____
c. Separation and protection from ignition sources?	<u>X</u>	—	—	_____

* METHYLENE CHLORINE WASTES & ACID WASTES, IF MIXED TOGETHER, WOULD LIBERATE CHLORINE GAS. ACID WASTE IS NEUTRALIZED BEFORE PUT IN CONTAINERS

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation of Facility: 265.31

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

YES	NO	NI	Remarks
—	X	—	_____

2. If required, does the facility have the following equipment: 265.32

- a. Internal communications or alarm systems?
- b. Telephone or 2-way radios at the scene of operations?
- c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X	—	—	_____
X	—	—	_____
X	—	—	_____

Indicate the volume of water and/or foam available for fire control:

SALVAGE YARD (DRUM STORAGE AREA) CONTAINS:
2 30-LB DRY CHEM. EXTINGUISHERS; 1 10-LB CO₂ EXTINGUISHER; 4 2 1/2 GAL AIR PRESSURIZED N₂O EXTING. + FIRE NOSE (300' LONG) & FIRE HYDRANT - CITY SUPPLY.

3. Testing and Maintenance of Emergency Equipment: 265.33

- a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
- b. Is emergency equipment maintained in operable condition?

X	—	—	_____
X	—	—	_____

4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34

X	—	—	_____
---	---	---	-------

5. Is there adequate aisle space for unobstructed movement?

X	—	—	_____
---	---	---	-------

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

X	—	—	_____
---	---	---	-------

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

COMPANY'S POLLUTION INCIDENT PREVENTION PLAN WAS REVIEWED - YES NO NI Remarks
 IT IS SUPPOSED TO COVER ALL MATERIALS AT THE PLANT

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X

7 INDIVIDUALS ARE LISTED AS "RESPONSIBLE FOR SPILL PREVENTION AND CONTROL", BUT NOT FORMALLY LISTED AS EMERGENCY COORDINATORS

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

X

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X

COMPANY BELIEVES AREA IS SUFFICIENTLY OPEN TO PROVIDE PROMPT ESCAPE

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

X

YES NO NI Remarks

3. Emergency Coordinator 265.55

a. Is the facility Emergency Coordinator identified?

 X NOT AS SUCH - SEE 1(c)

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

X

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

X

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

 X NOT APPLICABLE

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	---	---	---	<u>NOT APPLICABLE</u>
b. Are records of past shipments retained for 3 years?	---	---	---	<u>N/A</u>
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	---	---	---	<u>N/A</u>
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	---	---	---	<u>NO OPERATING RECORD KEPT AT PLANT</u>
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	---	---	---	<u>SEE ABOVE</u>
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	---	---	---	<u>SEE ABOVE</u>
***iii. A map or diagram of each cell or disposal area				<u>N/A</u>

*** only applies to disposal facilities

YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

SEE ABOVE

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

" "

v. Reports detailing all incidents that required implementation of the Contingency Plan?

" "

vi. All closure and post closure costs as applicable?

N/A - NO CLOSURE OR

4. Availability of Records 265.74

POST CLOSURE ~~ACTIVITIES~~ ACTIVITIES HAVE OCCURRED.

Are all facility records required under 40 CFR Part 265 available for inspection?

X

5. **Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or shipping paper?

N/A

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

N/A

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	X	---	---	_____
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	---	X	---	OPEN-ENDED CLOSURE PLAN - LISTS TIME-TABLE FOR CLOSURE SUBSEQUENT TO EPA OR DNR APPROVAL
ii. maximum hazardous waste inventory?	X	---	---	_____
iv. estimated year of closure?	---	X	---	SEE (i) ABOVE
v. schedule of closure activities?	X	---	---	_____
c. Has closure begun?	---	X	---	_____
*2. Post-Closure 265.118				
a. Is the post-closure plan available for inspection?	---	---	---	NOT APPLICABLE
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	---	---	---	N/A
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable	---	---	---	N/A
BB. facility monitoring equipment	---	---	---	N/A
iii. name, address, and phone number of person or office to contact during post-closure care period?	---	---	---	N/A
c. Has the post-closure period begun?	---	---	---	N/A
d. Is the written post-closure cost estimate available? 265.144	---	---	---	N/A

*Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are <u>ignitable</u> and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

N/A
NO INCOMPATIBLE WASTES
STORED TOGETHER - THEY
ARE NOT EVEN KEPT IN LOCATIONS
NEAR EACH OTHER.
(SEE PAGE J-1, ITEM 7)

Section J - TANKS (Part 265, Subpart J)

BOTH ~~ARE~~ FEED INTO WWTP. AND APPEAR TO BE ELIGIBLE FOR EXCLUSION UNDER ITEM (1) OF THE 'NOTE' ON PAGE Q-1 OF THIS FORM.

- | | YES | NO | NI | Remarks |
|--|-----|--------------|----|---|
| 1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192 | X | | | |
| 2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures? | X | | | |
| 3. Do continuous feed systems have a waste-feed cutoff? 265.193 | X | X | | OVERFLOW WOULD BE TO SUMPS - SEE PAGE Q1, ITEM 2 |
| 4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.194 | | | | N/A |
| 5. Are required daily and weekly inspections done? 265.198 | X | | | |
| 6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.199 | | | | N/A |
| 7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.199 | X | | | METHYLENE CHLORIDE IS TOTALLY SEPARATE FROM ACID - ACID IS IN TANK, METHYLENE CHLORIDE IS IN DRUMS - IN DIFFERENT BUILDINGS |
| 8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes? | | | | |
| TANK CAPACITY: <u>NOT APPLICABLE</u> gallons | | | | |
| TANK DIAMETER: _____ feet | | | | |
| DISTANCE OF TANK FROM PROPERTY LINE _____ feet | | | | |
| (See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.) | | | | |

Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

ALTHOUGH THIS SECTION IS COMPLETED, THE WRITER BELIEVES THE TREATMENT AT YES NO NI Remarks

THIS PLANT COMES UNDER THE EXEMPTION CITED IN ITEM (1) OF THE NOTE BELOW

- | | | | | |
|---|-------|---------------|-------|---|
| 1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401 | X | _____ | _____ | _____ |
| 2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)? | X | NI | _____ | IF TANK WERE TO OVERFLOW THE ROUTE OF THE OVERFLOW INTO BASEMENT JUMPS, THEN PUMPED IN BATCHWISE TO WASTEWATER TREATMENT PLANT. |
| 3. Has the owner or operator addressed the waste analysis requirements of 265.402? | _____ | _____ | _____ | N/A - NO NO CHANGES IN WASTE OR TREATMENT PROCESSES. |
| 4. Are inspection procedures followed according to 265.403? | X | _____ | _____ | DAILY FOR EVERYTHING |
| 5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405 | _____ | _____ | _____ | N/A |
| 6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406 | _____ | X | _____ | _____ |

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<u>X</u>	___	___	_____
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>X</u>	<u>X</u>	___	___	_____
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<u>X</u>	___	___	_____
b. Name, mailing address, telephone number, and EPA ID number of Generator	<u>X</u>	___	___	_____
c. Name and EPA ID Number of Transporter(s)?	<u>X</u>	___	___	_____
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u>X</u>	___	___	_____
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	___	___	_____
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	___	___	_____
g. Required certification?	<u>X</u>	___	___	_____
h. Required signatures?	<u>X</u>	___	___	_____
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>NONE</u>				_____
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>N/A</u>				_____

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

MID005356787

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. <i>COMPANY HAS FILED "PART A" PERMIT APPLICATION. HOWEVER, ALL CONTAINERS ARE REMOVED BEFORE 90 DAYS ELAPSES</i> A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?	—	—	—	<u>N/A</u>
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	—	—	—	<u>N/A</u>
iii. Met the Manifest requirements?	—	—	—	<u>N/A</u>
b. Importing Hazardous Waste; has the generator met the manifest requirements?	—	—	—	<u>N/A</u>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUL 11 1996

DRE-8J

General Motors Corporation
6307 W. Fort St.
Detroit, Michigan 48209

Re: New Federal Regulations on the
Import/Export of Hazardous Waste
General Motors Corporation
MID 005 356 787

Dear Sir/Madame:

I have enclosed a photo copy of the April 12, 1996, FEDERAL REGISTER, "Imports and Exports of Hazardous Waste: Implementation of OECD Council Decision, Final Rule." By July 11, 1996, persons involved in importing/exporting hazardous waste must be in compliance with the regulations published in the enclosed requirements which address the control of transfrontier movements of waste destined for recovery operations. These new requirements, promulgated under the authority of the Resource Conservation and Recovery Act as amended (RCRA), apply in all States, irrespective of States' RCRA authorization status.

If you have any questions regarding this Final Rule please contact the RCRA Hot Line 1-800-424-9346 or TDD 1-800-553-7272 (for the hearing impaired). In addition, selected supporting materials are available on the Internet. The April 12, 1996, FEDERAL REGISTER has instructions to access the information electronically.

Sincerely yours,

Uylaine E. McMahan
EP

Uylaine E. McMahan
Compliance Assistance Program Manager
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

**D. Corrective
Action**

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

NE
ENFORCEMENT
CONFIDENTIAL

OK to release
Shroye Stamp
8/15/10

Completed by: Mary Wojciechowski
Date: March 15, 1992

RECEIVED
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OCT 18 1995

Background Facility Information

Facility Name: GM Fischer Body Division - Detroit Fort Street Plant
EPA Identification No.: MID 005 356 787
Location (City, State): Detroit, Michigan
Facility Priority Rank: Low

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Entire facility - 4 SWMUs and 1 Area of Concern

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?
- No corrective action activities initiated (Go to 5)
 - RCRA Facility Assessment (RFA) or equivalent completed
 - RCRA Facility Investigation (RFI) underway
 - RFI completed
 - Corrective Measures Study (CMS) completed
 - Corrective Measures Implementation (CMI) begun or completed
 - Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

- Operating permit
- Post-closure permit
- Enforcement order
- Other (Explain)

A clean up took place in response to a spill in 1984. No further information is available.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

- Yes
- No
- Uncertain; still underway
- Not required

Additional explanatory notes:

There is no information regarding the adequacy of the clean up mentioned in question 3. It is also not known what environmental media (if any) were affected.

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

- Ground water
- Surface water
- Air
- Soils
- Unknown

6. Are contaminant releases migrating off-site?

- Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:

Surface water:

Air:

Soils:

- No
- Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

- Yes (Go to 8a)
- No
- Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

- Yes
- No
- Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

- Yes (Go to 9)
- No
- Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

- Yes
- No
- Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

- Yes
- No
- Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

- Yes
- No
- Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

- Yes
- No
- Uncertain

Additional explanatory notes:

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

- Solid
- Light non-aqueous phase liquids (LNAPLs)
- Dense non-aqueous phase liquids (DNAPLs)
- Dissolved in ground water or surface water
- Gaseous
- Other Unknown

13. Which of the following major chemical groupings are of concern at the facility?

- Volatile organic compounds (VOCs) and/or semi-volatiles
- Polynuclear aromatics (PAHs)
- Pesticides
- Polychlorinated biphenyls (PCBs) and/or dioxins
- Other organics
- Inorganics and metals
- Explosives
- Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

Yes; Indicate possible course of action.

No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

A release occurred in 1984 but is not known which environmental media (if any) were affected. The spill was reportedly cleaned up.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

Yes
 No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

Yes
 No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

Yes
 No
 Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

Yes
 No
 Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

- Yes
- No, not feasible
- No, not required

Explain final decision, using additional sheets if necessary.

On 11/21/84 1,300 gallons of diphenyl methane diisocyanate (MDI) was released at the facility. Facility representatives claim that the spill was cleaned up and all clean up residues were appropriately disposed of. However no information or documentation was provided regarding the spills location environmental media affected, extent of contamination and adequacy of clean up. Until more information is obtained, the need for stabilization cannot be determined.

HRE-8J

Stuart Lichter, President
S.L. Equities, Inc
P.O. Box 7000-242
Redondo Beach, CA 90277-9998

Re: Visual Site Inspection Report Fort/Livernois Industrial Property
(formerly GMC Fisher Body-Fort Street Plant) Detroit, MI
MID 005 356 787

Dear Mr. Litcher:

The United States Environmental Protection Agency (U.S.EPA) reviewed the Preliminary Assessment/Visual Site Inspection (PA/VSI) Final Report of the General Motors Corporation Fisher Body Division, Detroit Street Plant in Detroit, Michigan.

Enclosed please find the PA/VSI Final Report of the referenced facility. If you have any questions contact me at (312) 886-4449.

Sincerely yours,

Ivonne A. Vicente Morales
Environmental Engineer
Technical Enforcement Section #1

HRE-8J:IVICENTE:03/23/95:f:\user\share\tes.#1\GMC

OFFICIAL FILE COPY

CONCURRENCE REQUESTED FROM REB			
SEC/BR SECRETARY	AG 2/11/95		
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF

S.L. Warehousing- Detroit, Ltd.

P.O. Box 242
 REDONDO BEACH, CA. 90277
 310/378-0336
 FAX 310/378-0878

ONE WEST AVENUE
 LARCHMONT, NEW YORK 10538
 914/833-1500
 FAX 914/834-2002

March 21, 1995

Mr. Kevin M. Pierard
 Chief OH/MN Technical
 Enforcement Section
 U.S. Environmental Protection Agency

Re: Visual Site Inspection Report
 Fort/Livernois Industrial Property
 (formerly GMC Fisher Body- Fort Street
 Plant)
 Detroit, Michigan
 M1D00536787

Dear Mr. Pierard:

As per our recent phone conversation, we are requesting a copy of the "Preliminary Assessment/Visual Inspection Report" that resulted from your November 1991 site visit to our facility. We understand that this report is available to us as per your October 31, 1991 letter (copy enclosed) to me.

Please send the copies of the Visual Site Inspection Report to the following addresses:

S.L. Warehouse- Detroit, Ltd.
 c/o Leo D. Phillips, Manager
 725 South Adams, Suite 260
 Birmingham, Michigan 48009

S.L. Equities, Inc.
 Stuart Lichter, Pres.
 P.O. Box 7000-242
 Redondo Beach, CA. 90277-9998

Your prompt attention to this matter will be greatly appreciated.

Yours truly,


 Stuart Lichter
 President

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

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JAN 03 1995



PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION

GENERAL MOTORS CORPORATION
FISHER BODY DIVISION
DETROIT FORT STREET PLANT
DETROIT, MICHIGAN
MID 005 356 787

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	MID 005 356 787
Date Prepared	:	May 28, 1992
Contract No.	:	68-W9-0006
PRC No.	:	209-R05032MI09
Prepared by	:	PRC Environmental Management, Inc. (Sherry Gernhofer)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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Attachments

- A VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- B VISUAL SITE INSPECTION FIELD NOTES

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Yvonne A. Valente Morales

*This material can be
released. March 23 1995*

**ENFORCEMENT
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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the former General Motors Corporation, Fisher Body Division, Detroit Fort Street Plant (GM Fisher Body) facility in Detroit, Michigan. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

The facility covers about 35 acres and is located in a mixed industrial and residential area of western Detroit, Wayne County, Michigan. General Motors Corporation, Fisher Body Division, owned the facility from 1917 to 1991. GM Fisher Body manufactured exterior and interior trim used at the Fleetwood Plant in the assembly of Cadillac bodies. In 1991, the property was parceled and sold to two different companies. Sybill, Inc. purchased the parcel east of Dragoon Street and west of Calvary Street, which contains a wastewater treatment facility, two incinerators, and a power house. S.L. Warehousing Detroit, Ltd. purchased the remainder of the facility, which consists mainly of empty warehouses.

Information regarding former waste generating processes at the GM Fisher Body Plant was unavailable. Although the specific waste generating processes are unknown, the waste types generated at the former facility were identified through applications submitted and inspections performed. According to those documents, the majority of the wastes generated consisted of spent solvents and paint sludge generated by the former painting operations. In addition, wastes such as nickel sulfate and lead chromate were generated by the former plating operations.

On November 18, 1980, the facility submitted a RCRA Part A application to obtain interim status as a treatment, storage, and disposal facility. It is not known whether a closure plan was implemented. Sybill, Inc. submitted a notification of regulated waste activity on June 17, 1991, after assuming ownership of part of the former GM Fisher Body Plant. The facility currently is operated by two separate companies. Sybill, Inc. is operating the wastewater treatment facility and plans to reactivate the powerhouse and incinerators. S.L. Warehousing Detroit, Ltd. manages the empty warehouses and the former drum storage area. S.L. Warehousing intends to rent this space out (PRC, 1991).

RELEASED
DATE 12/4/00
RIN #
INITIALS

The PA/VSI identified the following four SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Wastewater Treatment System Receiving Tanks
2. Wastewater Treatment System Treatment Tanks
3. Incinerators (2)
4. Former Drum Storage Area

Area of Concern

1. Diphenyl Methane Diisocyanate Spill Area

The potential for release to any media from the SWMUs identified at this facility is low because it has sound secondary containment. In addition, only the wastewater treatment facility currently is operational. The remainder of the facility is either empty or inactive. The potential for release from the AOC identified is unknown, because information regarding the location and nature of the spill was unavailable. Although it was reported that the spill was contained and cleaned up, it is unknown whether any material escaped to the surrounding area.

No release to ground water was observed during the PA/VSI, nor have any documented releases from the SWMUs or AOC to ground water been identified. The potential for release is low because most of the facility grounds are paved. Sound secondary containment exists around the wastewater treatment system's receiving and treatment tanks (SWMUs 1 and 2). Similarly, the incinerators (SWMU 3) are located in a warehouse and are currently inactive. The former drum storage area (SWMU 4) is currently empty. In addition, ground water is not used for drinking water in this area.

No release to surface water was observed during the PA/VSI, nor have any documented releases to surface water been identified. The potential for release to surface water from any of the SWMUs or AOC is low because most of the facility grounds are paved and because secondary containment for the SWMUs is sound. In addition, any potential releases from the facility would be collected by the nearby storm water system and directed to the Detroit Water and Sewer Department (DWSD) combined sewer system that leads to the city publicly owned treatment works (POTW).

No release to the air was identified during the file review or observed during the PA/VSI. None of the SWMUs or AOC identified presents a significant threat of release to the air except

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the incinerators, which currently are inactive. The current owners do intend to reactivate the incinerators in order to burn sludge generated from the wastewater treatment system; that reactivation will increase the potential for release to the air.

No release to on-site soils was observed during the PA/VSI, nor have any documented releases to on-site soils from the SWMUs or AOC been identified. The potential for release to on-site soils from the SWMUs or AOC is low. Sound secondary containment, combined with the fact that most of the area is paved, makes the likelihood of a release to on-site soils very low. Access to the facility is limited by a fence that surrounds most of it. The empty warehouses are monitored routinely by on-site security personnel.

PRC recommends no further action at this time for the SWMUs. All SWMUs at the facility are either well maintained or currently inactive. No releases were identified and it seems unlikely that there is potential for release in the future. When and if the incinerators are brought back on line, the owner should obtain appropriate operating permits.

For the diphenyl methane diisocyanate spill area (AOC 1), PRC recommends that the facility furnish additional information about the incident, including the exact location of the spill and the manner in which it was cleaned up and disposed of. PRC has sent a written request to the facility for this information. Sampling might be required to characterize the contamination that might have resulted from the spill.

RELEASED
DATE 7/24/00
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INITIALS mu

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic

basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the former GM Fisher Body Plant in Detroit, Michigan. The PA was completed on October 14, 1991. PRC gathered and reviewed information from the Michigan Department of Natural Resources and from EPA Region V RCRA files. The VSI was conducted on November 14, 1991. It included interviews with four facility

representatives and a walk-through inspection of the facility. Four SWMUs and one AOC was identified at the facility.

The VSI is summarized and five inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B, and a letter to the parent company, General Motors Corporation (GMC), requesting information is included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

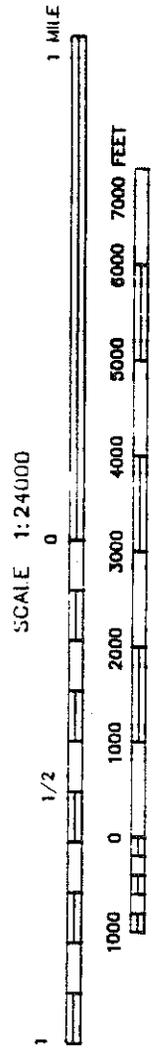
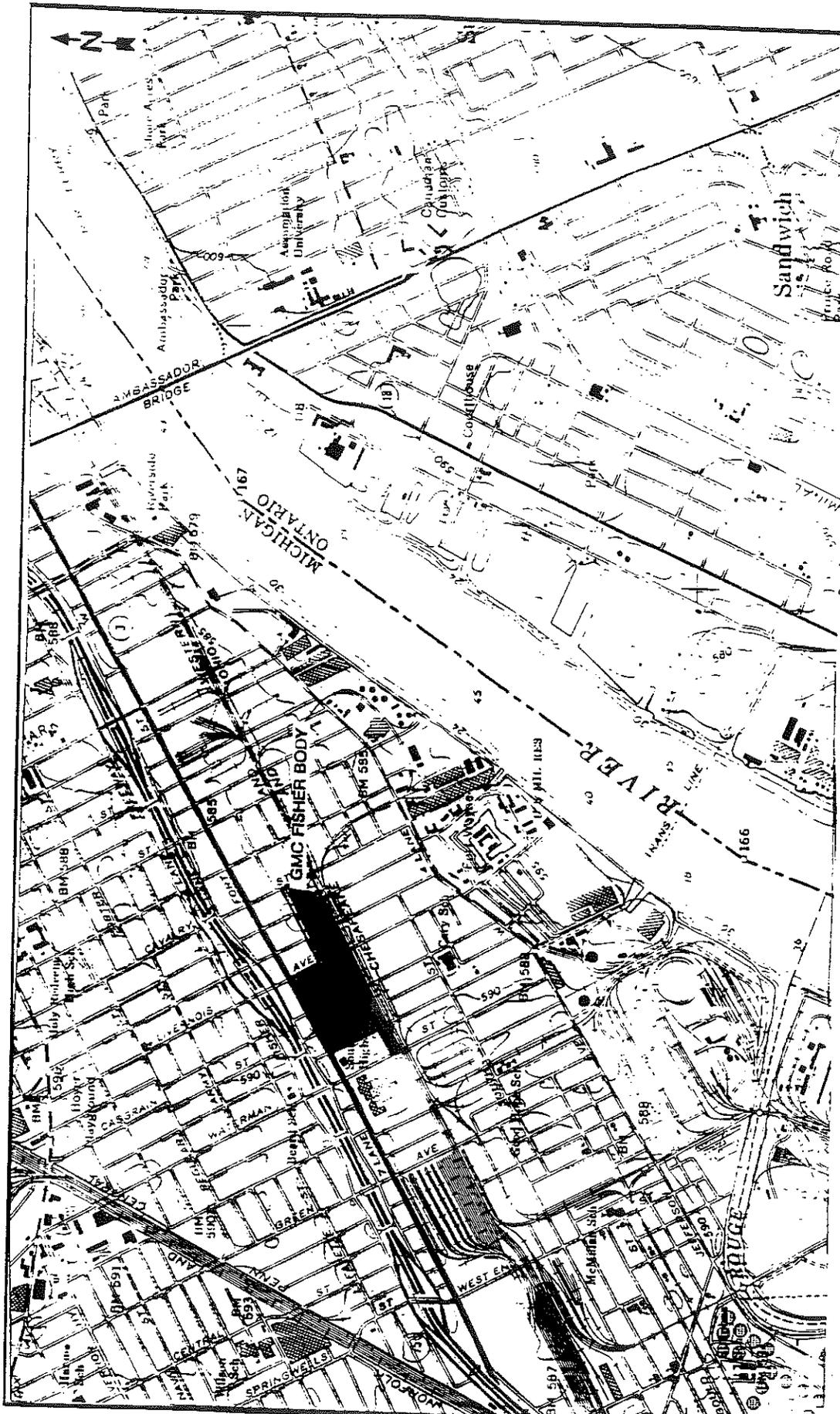
The former GM Fisher Body Plant was located at 6307 West Fort Street in western Detroit, Wayne County, Michigan (latitude 42°18'19" N, longitude 83°06'09" W), as shown in Figure 1. The facility occupies approximately 35 acres in an area characterized by heavy industrial, commercial, and urban-residential land use.

The facility is located one-half mile northwest of the Detroit River and encompasses several city blocks within the city of Detroit. GM Fisher Body is bordered on the south by the Norfolk and Western Railroad, on the north by Fort Street, on the east by Cavalry Avenue, and on the west by Waterman Street. In January 1991, GM Fisher Body subdivided the property and sold it to two different owners. Dragoon Avenue separates what is now two different facilities (Figure 2). Sybill, Inc. owns and operates the facility to the east of Dragoon Avenue (wastewater treatment plant, power house, and two incinerators) and S.L. Warehousing Detroit, Ltd. owns the property west of Dragoon Avenue (empty warehouses and former drum storage area).

For this report, the term "the facility" refers to the former GM Fisher Body Plant, not to specific parcels of land once owned by GM Fisher Body.

2.2 FACILITY OPERATIONS

GM Fisher Body began operating as an automotive components manufacturer in the 1920s. Past operations at the facility include metal plating, aluminum anodizing, painting, and varnish manufacturing. Recently, the facility has been involved in the production of soft- and hard-trim subassemblies, door hinges, and T-roof assemblies (Inland Fisher Guide, 1991). The exterior and interior trim parts manufactured at the facility were used at the Fleetwood Plant in the assembly of Cadillac bodies (MDNR, 1983). GM Fisher Body ceased operations at the facility in 1990. All manufacturing equipment has been removed; only empty warehouses remain. The equipment was either auctioned off or shipped to another GMC facility (PRC, 1991). No other information about



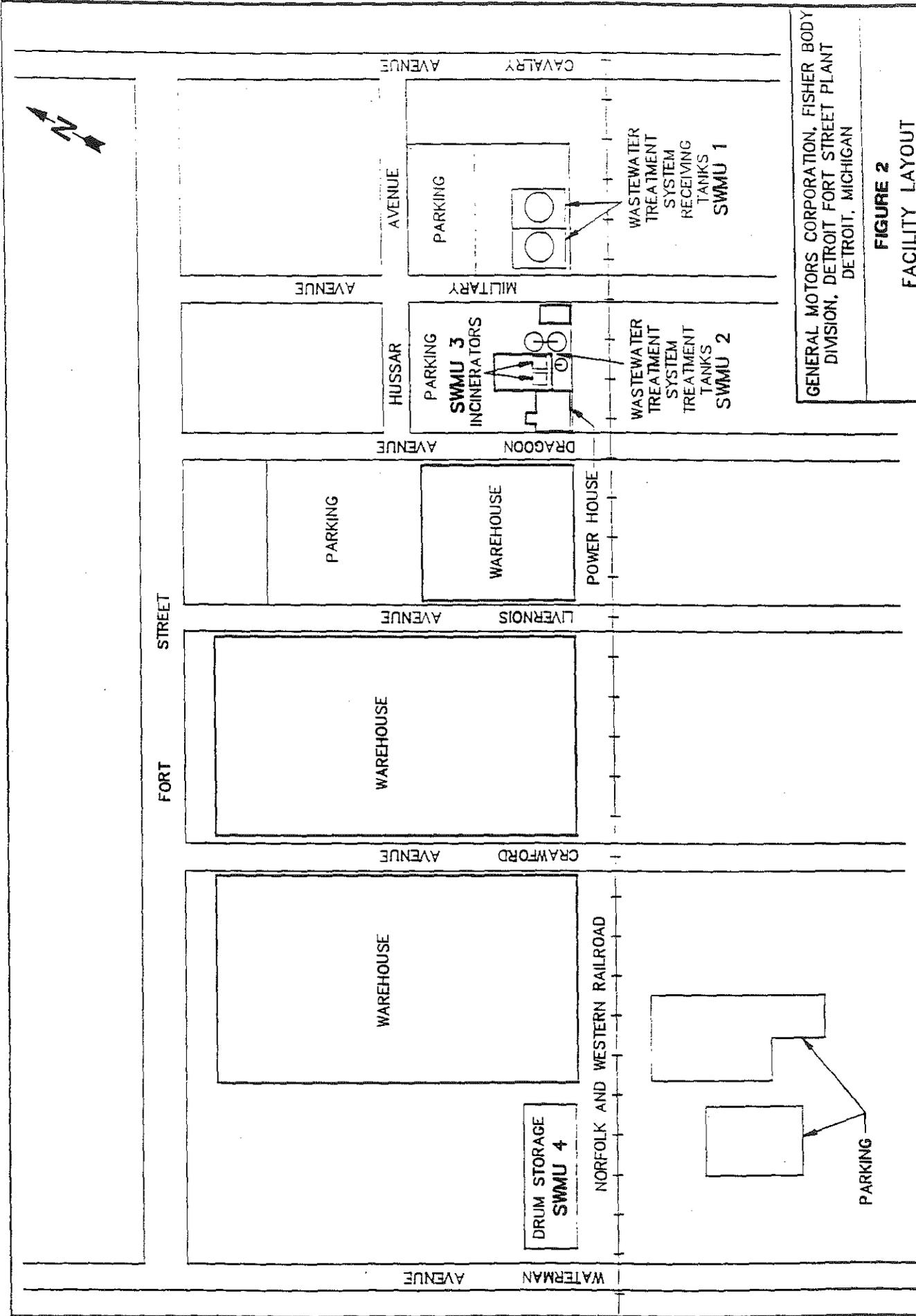
GENERAL MOTORS CORPORATION, FISHER BODY
 DIVISION, DETROIT FORT STREET PLANT
 DETROIT, MICHIGAN

FIGURE 1

FACILITY LOCATION

GMC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: USGS, 1973, 1980



GENERAL MOTORS CORPORATION, FISHER BODY DIVISION, DETROIT FORT STREET PLANT
 DETROIT, MICHIGAN

FIGURE 2
 FACILITY LAYOUT

PMC ENVIRONMENTAL MANAGEMENT, INC.

NOT TO SCALE

SOURCE: MODIFIED FROM GENERAL MOTORS CORPORATION, FISHER BODY DIVISION SKETCH, 1980

past operations was available from review of EPA's files on the facility or from conversations with former employees.

The facility currently is operated by two different owners. Sybill, Inc. (Sybill), operates the wastewater treatment system (SWMUs 1 and 2). Sybill is preparing to accept nonhazardous industrial wastewaters from local facilities for treatment in these units. In addition, Sybill, Inc. intends to reactivate the power house and refuse incinerators (SWMU 3). The rest of the former facility is occupied by S.L. Warehousing Detroit, Ltd., which currently is attempting to rent the area that once housed the bulk of the facility's operations (PRC, 1991). Table 1 lists the SWMUs identified at the facility and describes their current status.

2.3 WASTE GENERATING PROCESSES

Information about former waste generating processes at the GM Fisher Body plant was not available. PRC was unable to obtain this information from the facility's EPA file and was unsuccessful in soliciting the information from Inland Fisher Guide, the parent company and former owner. Although the specific waste generating processes are unknown, the waste types generated at the facility were listed in the facility's RCRA Part A permit application (EPA, 1980b), in the RCRA Generator Hazardous Waste Report for 1983 (EPA, 1983), and in a 1983 RCRA inspection conducted by MDNR (MDNR, 1983). According to these documents, the majority of the wastes generated at the facility consisted of spent solvents and paint sludge generated by the former painting operations. In addition, such wastes as nickel sulfate and lead chromate, were generated by the former plating operations. According to the Part A permit, the waste material was stored in 55-gallon drums (SWMU 4). Wastes subsequently were treated in tanks and surface impoundments (EPA, 1980b). The exact locations of the storage areas are unknown. Table 2 presents a summary of the types of solid wastes generated at the facility.

2.4 HISTORY OF DOCUMENTED RELEASES

On November 21, 1984, approximately 1,300 gallons of diphenyl methane diisocyanate (MDI) were released through a ruptured pressure gauge. All the material was contained in a diked area and subsequently cleaned up (Powser, 1985). Additional information regarding the exact location and nature of the spill was unavailable. It is unknown how the spill was cleaned up and disposed of. A request has been made to GM Fisher Body to provide additional information about the spill (see Attachment C).

Table 1
Solid Waste Management Units (SWMUs)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Wastewater Treatment System Receiving Tanks	No	Active
2	Wastewater Treatment System Treatment Tanks	No	Active
3	Incinerators	No	Inactive
4	Former Drum Storage Area	Yes	Inactive

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit application.

Table 2
Solid Wastes

Waste/EPA Waste Code	Source	Primary Management Unit*
Non-hazardous wastewaters	Wastewater treatment facility	SWMUs 1 and 2
Incinerator ash	From the incineration for the facility's refuse	SWMU 3
Waste silicone liquid	Foam line flush operation	SWMU 4
Waste methylene chloride mixture (F002, U080, U223)	Foam gun flush operation	SWMU 4
Waste paint sludge (D001)	Paint spraying operation	SWMU 4
Waste nickel sulfate mixture	Electroplating sludge	SWMU 4
Waste polyol liquid (F002, U080, U223)	Foam line flush operation	SWMU 4
Waste potassium hydroxide solution (D002)	Stripper sludge from painting operation	SWMU 4
Waste lead chromate mixture (D007, F006)	Electroplating sludge	SWMU 4
Compound paint reducing liquid (D001)	Paint gun flush operation	SWMU 4
Hazardous waste oil liquid (D008)	Plant waste oil	SWMU 4
Waste oil (D001)	Plant waste oil	SWMU 4
Dimethyl formamide mixture	Foam gun cleaner	SWMU 4
Waste toluene diisocyanate (U223)	Foam line operation	SWMU 4
Waste polychlorinated biphenyls	Waste oil	SWMU 4
Waste solvents	Painting operations	SWMU 4

Note:

* Primary management unit refers to the SWMU that currently manages or formerly managed the waste.

2.5

REGULATORY HISTORY

The GM Fisher Body plant submitted its first notification of hazardous waste activity on July 30, 1980 and submitted a subsequent notification on March 4, 1988. The facility submitted a RCRA Part A application to obtain interim status as a treatment, storage, and disposal facility on November 18, 1990. According to correspondence from the EPA to the GM Fisher Body Plant, a certified closure plan was submitted toward the end of 1985. Neither the closure plan nor the certification of closure was found; either would have confirmed the exact date of closure. It is not known whether the closure plan was implemented. PRC has requested this information from GM Fisher Body.

Sybill, Inc. submitted a notification of regulated waste activity on June 17, 1991, after assuming ownership of part of the former GM Fisher Body Plant. A request for transfer of EPA identification number from the GM Fisher Body Plant to Sybill, Inc. also was submitted with the notification form.

Several RCRA compliance inspections were conducted by the MDNR in September, 1982; March, 1983; May, 1985; and June, 1987 (MDNR, 1982; MDNR, 1983; MDNR, 1985; and MDNR, 1987). Inspectors noted violations involving the facility's waste analysis plan, inspection log, operating records (MDNR, 1982), security measures, personnel training (MDNR, 1982; MDNR, 1985), and owner or operator inspections (MDNR, 1987). GM Fisher Body responded to the notices of violation with corrective action (GMC, 1982; GMC, 1985; and GMC, 1987).

No NPDES permits were identified during the review of the EPA file, nor did personnel from Sybill, Inc. or S.L. Warehousing Detroit, Ltd. know whether any NPDES permits existed. However, Sybill, Inc. indicated during the PA/VSI that the corporation had been approved for an industrial wastewater treatment permit to discharge to the Detroit Water and Sewer Department (DWSD). At the time of the site inspection, Sybill, Inc. had not yet had its first discharge to the DWSD (PRC, 1991).

Approximately 40 operating air permits were issued to the former GM Fisher Body Plant. Although specific information is missing regarding which areas of operation the permits covered, it is likely that the permits regulated air discharges from the boilers, the manufacturing equipment, and the two incinerators (SWMU 3) used to burn the facility's trash (PRC, 1991). No information was available regarding the facility's compliance with their air permits.

2.6

ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the GM Fisher Body Plant. Facility-specific information regarding the environmental setting was not available; therefore, regional data were used.

2.6.1 Climate

The climate in Detroit and its surrounding area is characterized by evenly distributed precipitation throughout the year. The average annual precipitation is 30 to 33 inches. The annual net precipitation in the Detroit area is in the range of 5 to 15 inches (Federal Register, 1990). Average monthly temperatures range from a high of 72 degrees Fahrenheit (°F) in July to a low of 23°F in January. Weather in the vicinity is controlled by: (1) location with respect to major storm tracks, and (2) proximity to, and influence of, the Great Lakes. Typical winter storms bring periods of rain or snow. Summer storms usually pass to the north and often are associated with brief showers and sometimes thunder showers with high winds. The Great Lakes mitigate most climatic extremes (Erickson, 1990).

Due to the topography of the area, the moist northwest air dries before it reaches the Detroit area. For example, summer showers coming from the northwest often dissipate before reaching Detroit. The winter northwesterly winds bring snow to all of Michigan but rarely in accumulations of measurable depth in the Detroit area. The southeasterly winds generally contain more moisture. In any season, the area's heaviest precipitation is brought on by southeasterly winds. The prevailing wind direction in the Detroit area is from the southwest. One-year 24-hour rainfall for this area is about 2 inches (National Oceanic and Atmospheric Administration [NOAA], 1980).

2.6.2 Flood Plain and Surface Water

The closest surface-water body to the GM Fisher Body Plant is the Detroit River, located approximately 3,000 feet northeast of the facility. The Detroit River is Detroit's primary drinking-water source. Surface waters from the facility drain into the Detroit Water and Sewer Department (DWSD) combined sewer system and subsequently to the city publicly owned treatment works (POTW). The GM Fisher Body Plant is not located in a 100-year flood plain area (U.S. Geological Survey [USGS], 1974).

2.6.3 Geology and Soils

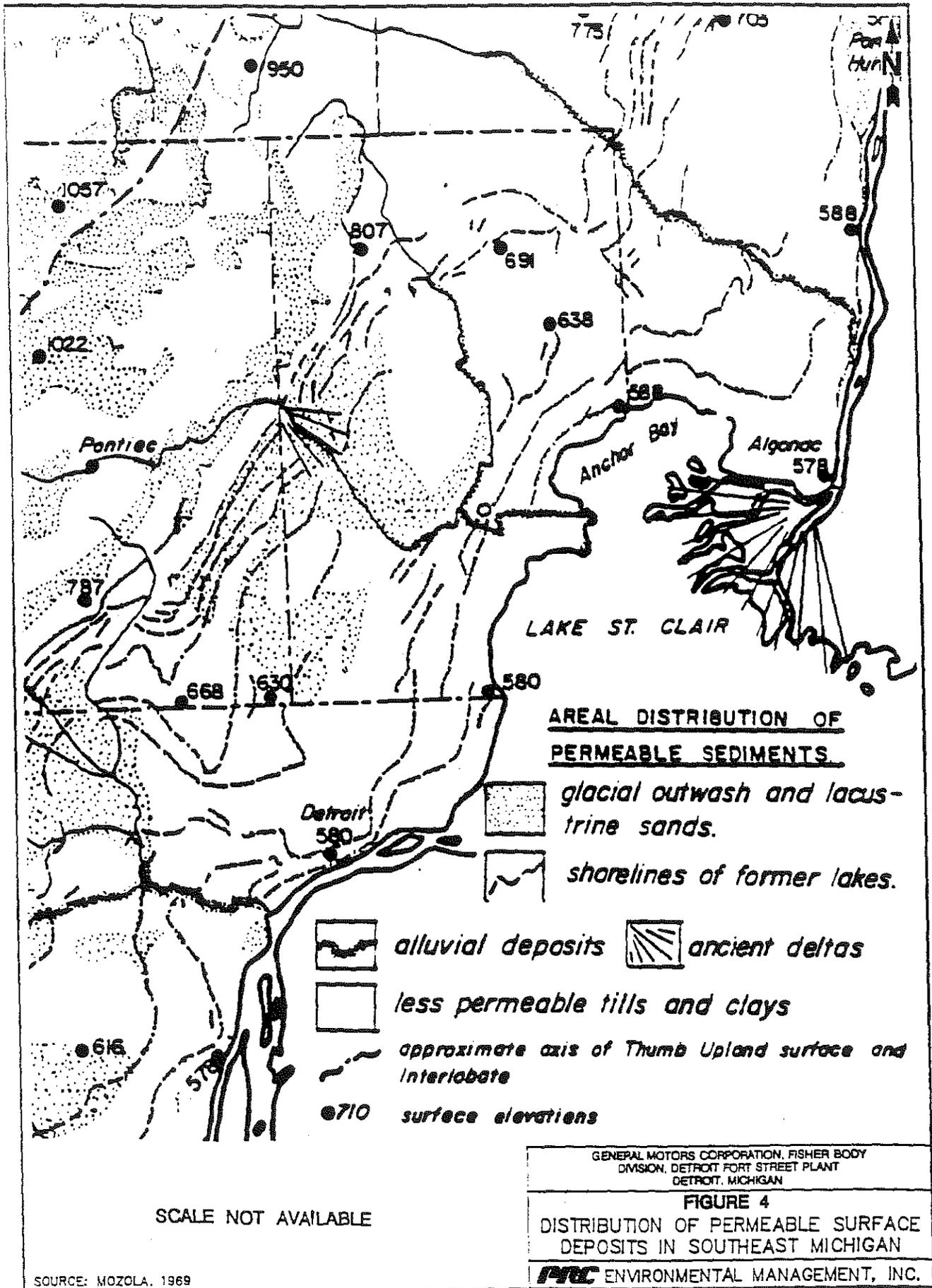
Because site-specific information was not available, regional geologic and soil information is presented. Figure 3 illustrates a generalized geologic cross section of the Detroit area. The surface geology of the Detroit area is characterized by a mosaic of glacial and organic deposits. Present land forms are the result of Pleistocene epoch glaciation and subsequent deposition and erosion. Primarily, the present land forms consist of materials deposited during the Cary substage of the Wisconsin Glacial stage; however, the hardpan encountered just above the bedrock in downtown Detroit occupies part of an ancient glacial lake bed of gently sloping to nearly flat terrain that has been incised by currently flowing rivers and streams. In this area, glacial deposits over bedrock range in thickness from 120 to 200 feet. These deposits consist mainly of layers of glacial till of varying thickness and a thick sequence of lacustrine clays and silts. Figure 4 illustrates the areal distribution of permeable surface deposits in southeast Michigan.

The bedrock of Detroit consists of approximately 830 feet of consolidated and cemented Middle Devonian limestone from the Paleozoic era. This structural feature underlies all of Michigan and portions of neighboring states. With this structural basin, the sedimentary rocks dip at an angle of less than 1 degree toward the center of the basin, which is located beneath the central portion of the southern peninsula (Mozola, 1969).

Soils of the area surrounding the facility are mainly of the Wasepi-Gilford-Boyer soil association. This type of soil is characterized by nearly level to sloping, very poorly drained, somewhat poorly drained, and well drained soils that have a coarse textured or moderately coarse textured subsoil. Permeability is moderately rapid, and water capacity is low. About 50 percent of the soils in this association are poorly drained, 25 percent are very poorly drained, and 15 percent are well drained. The remaining 10 percent consists of minor soils (U.S. Soil Conservation Service, 1977).

2.6.4 Ground Water

No site-specific information pertaining to ground water was available during the PA/VSI; however, a description of ground-water conditions based on regional information is given below. Based on information obtained during the PA/VSI, ground water is not used within a 3-mile radius of the site.



Ground water occurs beneath the site in water table conditions at approximately 40 feet beneath ground surface and generally flows toward the Detroit River. However, because Detroit is located on a glacial lake plain, composed primarily of silts and clays, the area is not favorable for the development of wells having moderate-to-large yields. Storage capacities are limited and well failures can be expected during prolonged droughts (USGS, 1989). Although the lake plain has a high frequency of dry holes, small domestic supplies in intermittent zones of relatively greater permeability than the surrounding clay and silt deposits are normally possible (Figure 5). These intermittent zones occur under confined conditions, and both flowing and non-flowing wells can be expected. Southeast of the junction of the lake plain with the glacial moraines (Figure 6), the frequency of occurrence, thickness, and extent of these confined ground-water bearing zones decreases as the formations near the Detroit River.

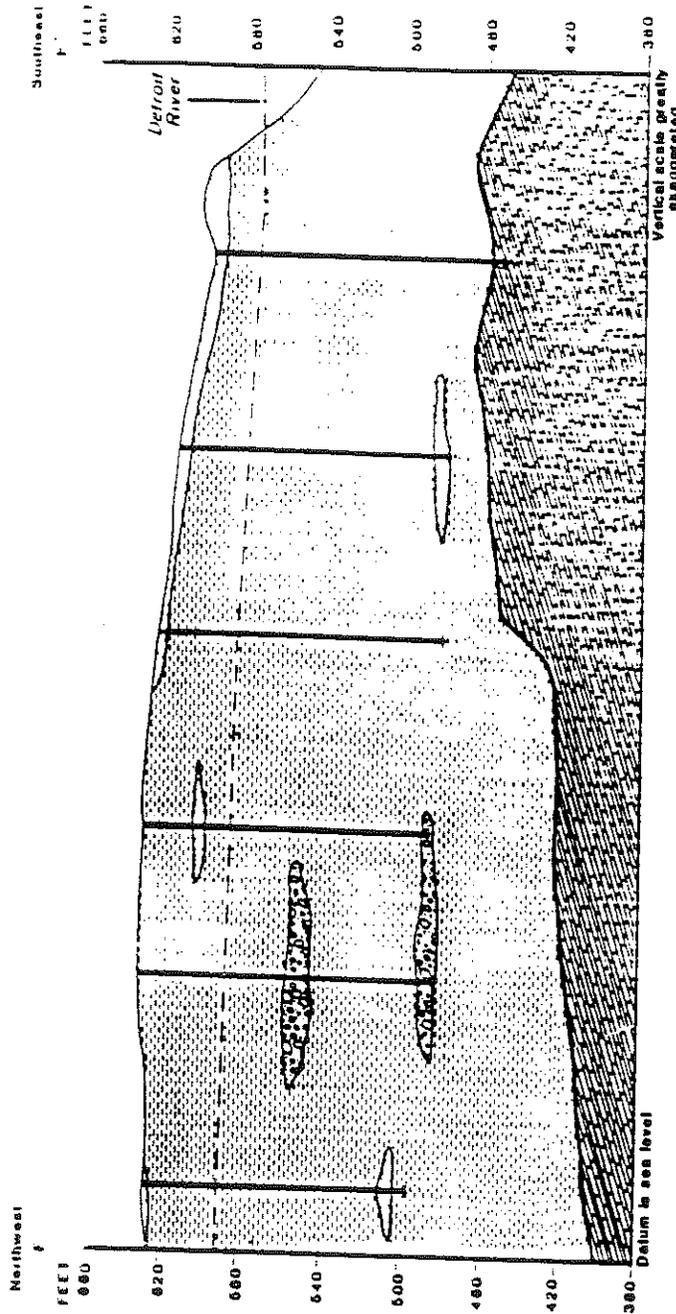
Although the silt and clay deposits beneath the site have limited ability to yield usable quantities of water, the quality of the shallow ground water is usually soft and potable unless contaminated by man. In the intermittent zones mentioned above, mineralization increases with depth. In addition, the quality of water from deep confined zones is often impaired by chlorides, hydrogen sulfide, and methane gas (Mozola, 1969).

2.7 RECEPTORS

The GM Fisher Body Plant occupies approximately 35 acres in a mixed industrial and residential area of western Detroit, Wayne County, Michigan. Most of the facility is paved. No sensitive environments were identified within two miles of the facility.

The GM Fisher Body Plant is bordered on the north by Fort Street, on the west by Waterman Street, on the east by Cavalry Avenue, and on the south by the Norfolk and Western Railroad. There are residences, a high school, and numerous businesses adjacent to the property. Most of the facility is located within the confines of a warehouse. Access to the facility is controlled by fences and on-site security personnel.

The nearest surface water, the Detroit River, is less than a mile away. Surface waters drain from the facility to the Detroit combined sewer system. The combined sanitary sewer discharges to the publicly owned treatment works (POTW) before discharge to the Detroit River (PRC, 1991). The Detroit River is used as the primary drinking water source for Detroit and for recreation.



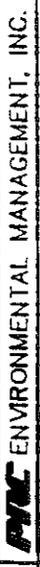
- EXPLANATION
- DESCRIPTION OF UNITS
- Surficial deposits
- Sand
 - ▨ Sand and gravel
 - Clay and (ll)
- Bedrock
- ▨ Limestones and dolomite
- WATER TABLE
- CONTACT
- BEDROCK SURFACE
- I WELL



GENERAL MOTORS CORPORATION, FISHER BODY
DIVISION, DETROIT FORT STREET PLANT
DETROIT, MICHIGAN

FIGURE 5

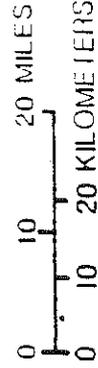
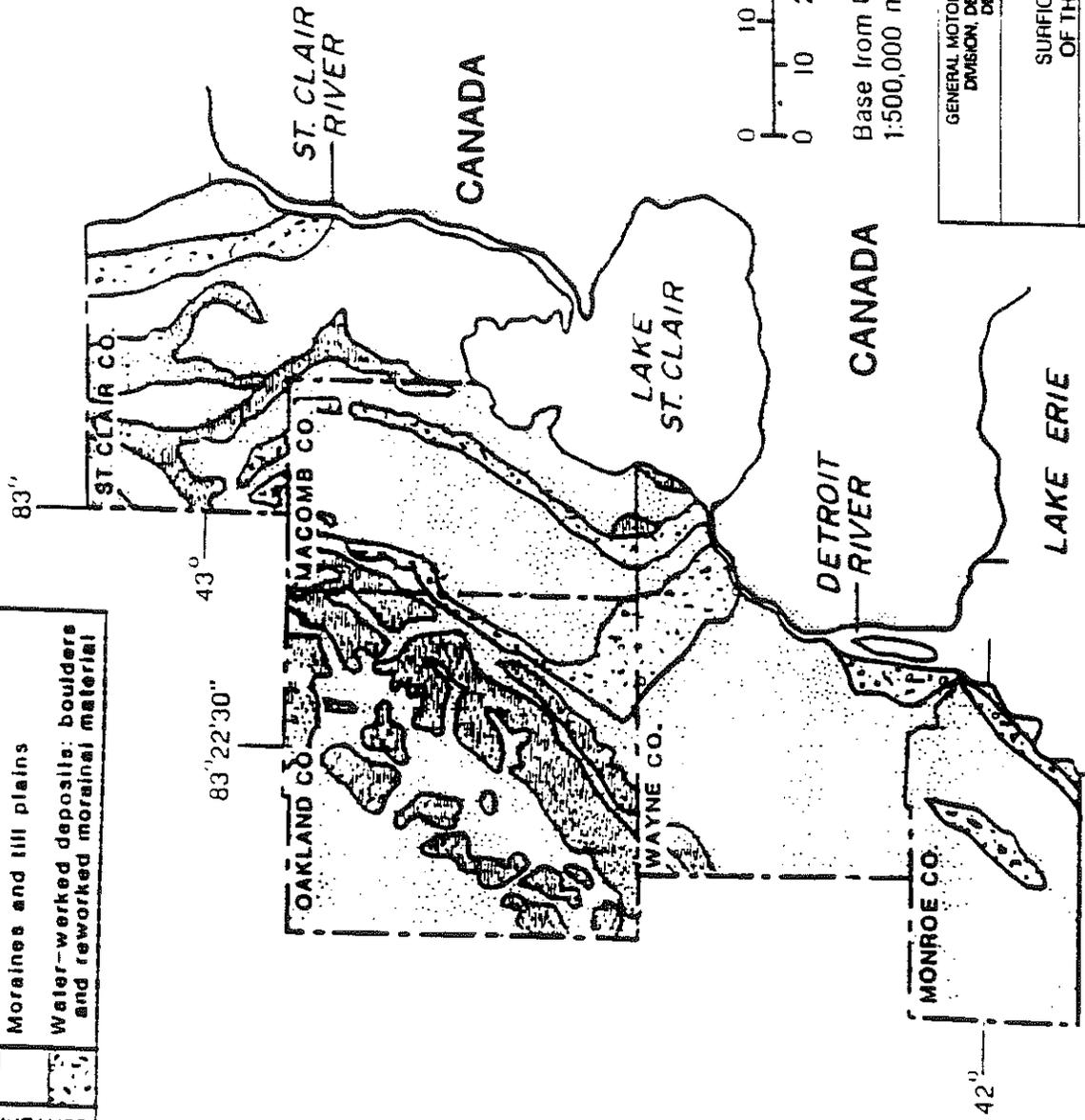
REPRESENTATIVE GEOLOGIC CROSS-SECTION
OF THE DETROIT AREA



EXPLANATION

	Lakebeds, sand and clay
	Moraines and till plains
	Water-worked deposits: boulders and reworked moraine material

QUATERNARY



Base from U.S. Geological Survey
1:500,000 map

GENERAL MOTORS CORPORATION, FISHER BODY
DIVISION, DETROIT FORT STREET PLANT
DETROIT, MICHIGAN

FIGURE 6

SURFICIAL GLACIAL FEATURES
OF THE DETROIT RIVER AREA

EMC ENVIRONMENTAL MANAGEMENT, INC.

As discussed in Section 2.6, the geology underneath the Detroit area is least favorable for the development of wells of moderate-to-large yields. During the PA/VSI no wells were identified within a 3-mile radius of the site.

There are residences directly across the street from and northeast of the facility. The prevailing wind direction in the Detroit area is from the southwest. Under these conditions, releases of hazardous constituents to the air would be directed to the northeast toward those residences.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the four SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and PRC observations.

SWMU 1

Wastewater Treatment System Receiving Tanks

Unit Description: The unit consists of two 250,000-gallon storage tanks that receive incoming wastewaters. The two steel tanks rest on a fiberglass-reinforced concrete floor within a concrete retaining wall that has a concrete splash extension. The perimeter of the storage area is 85 feet by 80 feet. The unit will be operated by Sybill, Inc. to treat nonhazardous wastewaters received from off-site generators. Photos 1, 2, 3, and 4 in Attachment A depict this unit.

Date of Startup: Tanks were constructed in 1972.

Date of Closure: This unit currently is operational.

Wastes Managed: The unit manages nonhazardous wastewaters from a variety of industrial processes.

Release Controls: This unit is surrounded by a 6-foot high, 10-inch thick reinforced concrete wall. The containment volume exceeds 305,000 gallons and surpasses the regulation for a containment volume equal to the volume of the largest tank (250,000 gallons). There are no drains within this containment. The floor of the area is concrete reinforced with fiberglass. Rain water and snow-melt water are monitored daily and pumped into the treatment tanks when necessary.

History of Release: No release from this SWMU were identified during the PA/VSI.

Observations: During the VSI, the tanks and surrounding concrete containment appeared to be in good condition, with no cracks or signs of fatigue in the tanks or the concrete. The unit had received several shipments of wastewater.

SWMU 2

Wastewater Treatment System Treatment Tanks

Unit Description: This unit consists of two 360,000-gallon and one 170,000-gallon tank, used for treating the wastewaters pumped over from the receiving tanks (SWMU 1). The three steel tanks rest on a fiberglass-reinforced concrete floor within a concrete retaining wall that has a concrete splash extension. The unit will be operated by Sybill, Inc. to treat nonhazardous wastewaters received from off-site generators. Photo 4 in Attachment A depicts this unit.

Date of Startup: The tanks were constructed in 1967.

Date of Closure: This unit currently is operational.

Wastes Managed: The unit manages non-hazardous wastewaters from a variety of industrial processes.

Release Controls: This unit is surrounded by an 8-foot high, 9-inch thick reinforced concrete wall. In addition, a splash guard has been installed at appropriate locations along the concrete wall. Total containment volume exceeds 550,000 gallons and surpasses the regulation for a containment volume of one and one-half times the volume of the largest tank (360,000 gallons). All drains have been backfilled with concrete to preclude their use (PRC, 1991). The flooring of the unit is concrete reinforced with fiberglass. The area of the unit is 14,148 square feet. Rain water and snow-melt water are monitored daily and pumped into the treatment tanks when necessary.

History of Release: No releases from this SWMU were documented during the PA/VSI.

Observations: During the VSI, the tanks and surrounding concrete containment appeared to be in good condition with no cracks or signs of fatigue in the tanks or the concrete. The unit was in operation.

SWMU 3

Incinerators

Unit Description: Two (2) dual Consumat incinerators are located inside a 16,000-square-foot building, of which 10,000 square feet are used as a "tipping" floor for receiving wastes. The dual-chamber incinerators are capable of handling 100 tons per day and work in concert with a heat recovery steam boiler. The incinerators received nonhazardous wastes from other facilities, as well as from their own.

Date of Startup: 1985. The units operated for approximately 5 years.

Date of Closure: The incinerators have been inactive since 1990. The current owners plan to reactivate the units to burn sludge generated by the wastewater treatment plant.

Wastes Managed: The incinerators once received the facility's trash, which consisted of 90 percent wood and 10 percent plastic. It is anticipated that the incinerators will burn wastewater treatment plant sludge beginning approximately in June 1992.

Release Controls: The units are housed in a building that has concrete flooring. The walls of the building provide containment.

History of Release: No releases from this SWMU were documented during the PA/VSI.

Observations: The building that houses the incinerators essentially was empty. Both incinerators were inactive. Their structures appeared sound.

SWMU 4 Former Drum Storage Area

Unit Description: This unit consists of a concrete pad located on the southwest corner of the facility. The pad is a 53.5-foot by 40.25-foot paved concrete area constructed with a 4,400-gallon sump basin for collecting any hazardous waste spills. The entire surface is contained by a water dam and dikes. No more than 1,040 drums could be stored at any one time. This unit formerly was used to store the facility's hazardous wastes. Drums of wastes generated by facility operations were stored in this area until they were disposed of offsite. The unit also is protected by an overhead canopy. Photo 5 in Attachment A depicts this unit.

Date of Startup: Unknown

Date of Closure: Approximately 1985

Wastes Managed: The hazardous wastes stored at this unit included flammable liquids, flammable solids, and waste methylene chloride mixtures (F002, U080, U223). Other wastes stored included silicone liquid, paint sludge, nickel sulfate, polyol liquid, potassium hydroxide, lead chromate, paint reducing liquid, waste oil, dimethyl formamide, toluene diisocyanate, and other miscellaneous solvents. It is unknown how the wastes were disposed of.

Release Controls: This unit consists of a diked concrete pad that is covered by a canopy. The diked pad is supplemented by a 4,400-gallon sump. A secured fence surrounds the perimeter.

History of Release: No releases from this SWMU were documented during the PA/VSI.

Observations: During the VSI, the unit was empty but appeared to be in good condition, with few signs of fatigue in the concrete or canopy.

4.0 AREAS OF CONCERN

PRC identified one AOC during the PA/VSI. The AOC is discussed below; its location is unknown.

AOC 1

Diphenyl Methane Diisocyanate Spill Area

No specific information regarding the location or history of this spill was available. It was reported that 1,300 gallons were released through a ruptured pressure gauge and that all the material was contained and cleaned up. This unit is being identified as an AOC because of the lack of information regarding the incident. PRC has requested that GM Fisher Body provide information concerning the location, nature, history, and cleanup of the spill.

RELEASED
DATE 12/1/00
RIN #
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5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified four SWMUs and no AOCs at the GM Fisher Body Plant facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the GM Fisher Body Plant facility and suggests further action.

SWMU 1 Wastewater Treatment System Receiving Tanks

Conclusions: This unit currently poses little threat of release. The system has adequate secondary containment and seems structurally sound and well maintained. The threat of release from this unit by various pathways is summarized below.

Ground Water: Low. The surrounding soils are paved, thus limiting the vertical migration of contaminants. In addition, ground water is not used for drinking water or for industrial purposes in this area.

Surface Water: Low. The unit has sound secondary containment, capable of controlling a spill. In addition, any spilled material escaping the secondary containment would be collected by the storm sewer system and directed to the city's publicly owned treatment works (POTW) before being released to the Detroit River.

Air: Low. The facility currently does not manage wastes that have a significant potential for releasing hazardous constituents into the air.

On-site Soils: Low. The surrounding soils are paved, thus limiting the potential for release to on-site soils. In addition, wastes currently managed do not pose a significant threat of a release of hazardous constituents. Should a spill of the nonhazardous industrial wastewaters occur, the material either would be contained or would be directed to nearby sewers, limiting the threat to on-site soils.

Recommendations: No further action is recommended at this time.

SWMU 2 Wastewater Treatment System Treatment Tanks

Conclusions: This unit currently poses little threat of release. The system has adequate secondary containment and seems structurally sound and well maintained. The threat of release from this unit through various pathways is summarized below.

ENFORCEMENT
CONFIDENTIAL

Table 3

SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Suggested Further Action
1. Wastewater Treatment System Receiving Tanks	1972 to present	None	No further action
2. Wastewater Treatment System Treatment Tanks	1967 to present	None	No further action
3. Incinerators	1985 to unknown date	None	No further action
4. Former Drum Storage Area	Unknown date to 1985	None	No further action

AOC	Dates of Operation	Evidence of Release	Suggested Further Action
1. Diphenyl Methane diisocyanate spill area	Unknown	Yes	Provide additional information. Sampling may be necessary

RELEASED
DATE 12/9/00
RIN #
INITIALS WJ

Ground Water: Low. The surrounding soils are paved, thus limiting the vertical migration of contaminants. In addition, ground water is not used for drinking water or for industrial purposes in this area.

Surface Water: Low. The unit has sound secondary containment capable of controlling a spill. In addition, any spilled material escaping the secondary containment would be collected by the storm sewer system and directed to the city's POTW before being discharged to the Detroit River.

Air: Low. The facility currently does not manage wastes that have a significant potential for releasing hazardous constituents into the air.

On-site Soils: Low. The surrounding soils are paved, thus limiting the potential for release to on-site soils. In addition, wastes currently managed do not pose a significant threat of a release of hazardous constituents. Should a spill of the nonhazardous industrial wastewaters occur, the material either would be contained or would be directed to nearby sewers, limiting the threat to on-site soils.

Recommendations: No further action is recommended at this time.

SWMU 3

Incinerators

Conclusions: This unit is currently inactive and therefore poses no current threat of release. In addition, the unit is located within the confines of a warehouse. Should the incinerators be brought back on line, only the threat of release to air will increase significantly. The threat of release from this unit through various pathways is summarized below.

Ground Water: Low. The unit is inactive. The surrounding soils are paved, thus limiting the vertical migration of contaminants. In addition, ground water is not used for drinking water or for industrial purposes in this area.

Surface Water: Low. The unit is inactive. No waste material currently is being managed by the incinerators.

Air: Low. The unit is inactive. No waste material currently is managed by the incinerators. The threat of release to air will increase if the incinerators are brought back on line.

On-site Soils: Low. The unit is inactive. The surrounding soils are paved, thus limiting the potential for release to on-site soils. In addition, the unit is inactive. No waste material currently is being managed in the incinerators.

Recommendations: No further action is recommended at this time.

SWMU 4

Former Drum Storage Area

Conclusions: This unit currently poses little threat of release. The unit is inactive. All waste material has been removed and disposed of off site. In addition, no

RELEASED
DATE 12/11/02
RIN #
INITIALS CW

REFERENCES

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- GMC, Fisher Guide Division, 1987, Michael Melekian's response to violations cited during the June 1, 1987 RCRA inspection performed by the MDNR, June 18.
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- Michigan Department of Natural Resources (MDNR), Water Quality Division, 1982, Resource Conservation and Recovery Act (RCRA) Inspection of the GM Fisher Body Plant, September 10.
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- Powser, J.W., 1985, Information supplied by Mr. Powser, plant manager for GM Fisher Body, Certification regarding potential releases from solid waste management units, September 12.
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Sybill, Inc., 1991, Pollution Incident Prevention Plan, September 27.

U.S. Environmental Protection Agency (EPA), 1980a, RCRA Notification of Hazardous Waste Activity at the GM Fisher Body Plant, July 30.

EPA, 1980b, RCRA Part A Hazardous Waste Permit Application for the GM Fisher Body Plant, November 18.

EPA, 1983, RCRA Generator Hazardous Waste Report for 1983 for the GM Fisher Body Plant, February 16.

EPA, 1985, Response to request for change in status to "Generator Accumulating Waste On Site" in Compliance with 40 CFR 262.34 for the GM Fisher Body Plant, August 20.

EPA, 1988, RCRA Notification of Hazardous Waste Activity at the GM Fisher Body Plant, March 4.

EPA, 1991, RCRA Notification of Regulated Waste Activity for Sybill, Incorporated, June 17.

U.S. Geological Survey (USGS), 1974, Map of flood prone areas.

USGS, 1989, Ground water flow and quality near the upper Great Lakes connecting channels, Michigan.

U.S. Soil Conservation Service, 1977, Soil survey of Wayne County area, Michigan.

ATTACHMENT A
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

GENERAL MOTORS CORPORATION
FISHER BODY DIVISION
DETROIT FORT STREET PLANT
DETROIT, MICHIGAN
MID 005 356 787

Date: November 14, 1991

Facility Representatives: D.A. (Don) McGlone, General Manager, Nave, Inc. (Sybill, Inc.), (313) 336-7750
John G. Christopher, Treasurer, Nave, Inc. (Sybill, Inc.), (313) 928-5572
Terrence P. Conway, Associate Coordinator, Office of General Counsel, General Motors Corporation (313) 974-1154
Leo Phillips, S.L. Warehousing Detroit, Ltd.

Inspection Team: Sherry Gernhofer, PRC Environmental Management, Inc.
Dave Phillips, PRC Environmental Management, Inc.

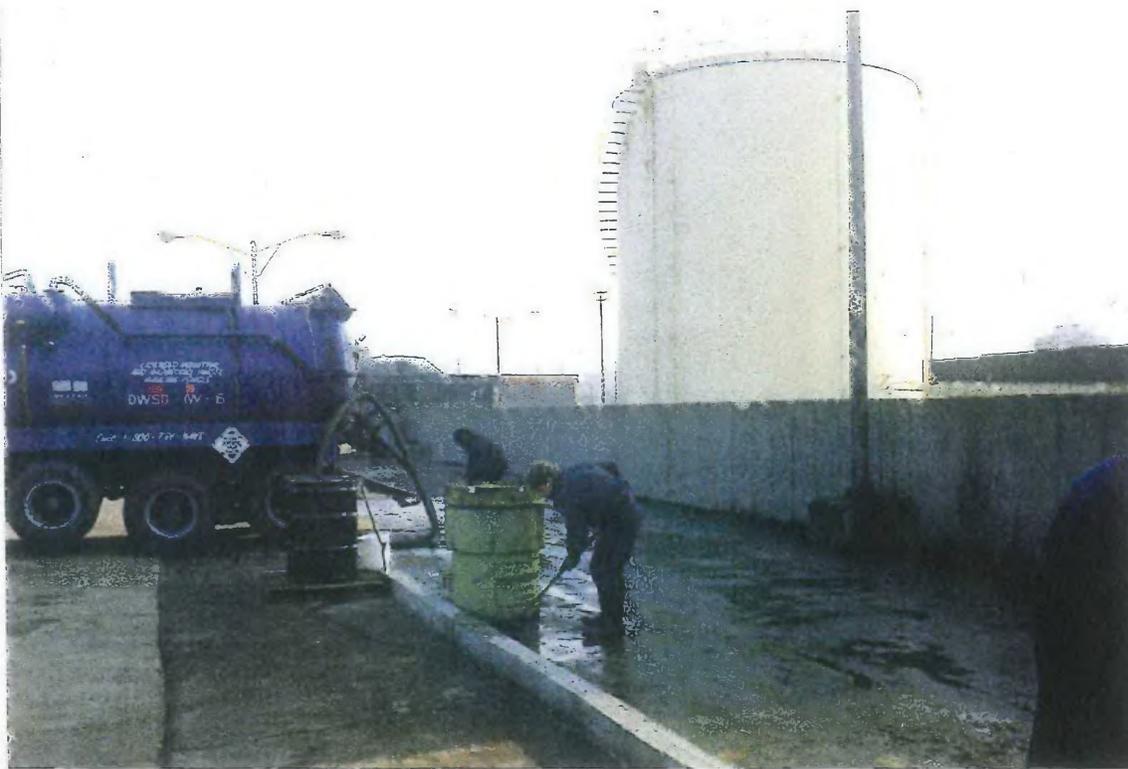
Photographer: Sherry Gernhofer

Weather Conditions: Partly cloudy, low 40s

Summary of Activities: The inspection team arrived at the facility at 9:00 a.m. A pre-inspection briefing was given to representatives of Nave, Inc. After the briefing, the inspection team waited for some time for representatives from the Michigan Department of Natural Resources, S.L. Warehousing Detroit, Ltd., and General Motors Corporation. Those representatives never arrived to complete the first part of the inspection.

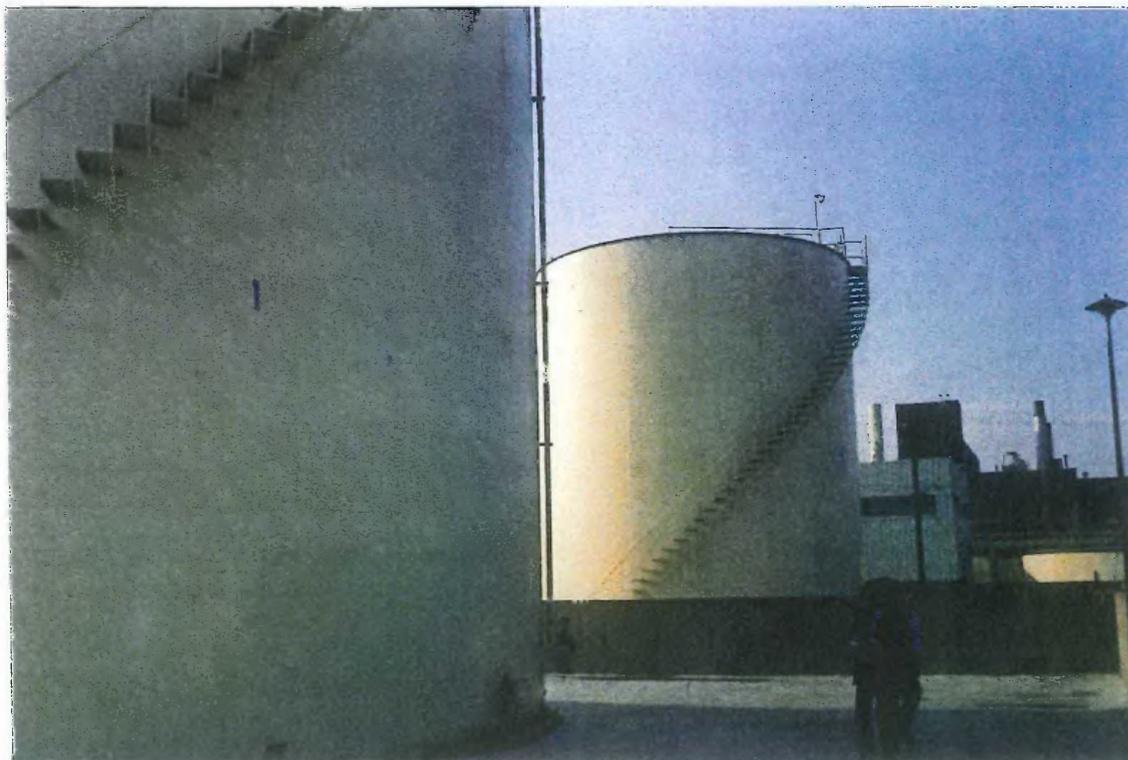
The site tour of the parcels owned and operated by Sybill, Inc. commenced at 10:10 a.m. A tour of the wastewater treatment plant was given. PRC inspectors were allowed to view the tanks and were given a description of the process. A tour of the inactive power house and incinerators also was given. Photographs were taken of the facility's solid waste management units. The tour was completed by 11:00 a.m.

After the inspection of the parcels owned by Sybill, Inc., an attempt was made to contact the remaining persons involved in the inspection. The representatives from S.L. Warehousing Detroit, Ltd. and General Motors were waiting on the other side of the facility, on the parcel currently owned by S.L. Warehousing Detroit, Ltd. Dave Phillips gave these individuals a preinspection briefing on the purpose and scope of the PA/VSI. A tour of the remaining areas of the facility began at 11:45 a.m. The remaining parts of the facility consisted of empty warehouse and an empty drum storage area. The tour ended at 1:00 p.m.



Photograph No. 1
Orientation: West
Description: Wastewater treatment system receiving tank
(note dikes and concrete secondary containment)

Location: SWMU 1
Date: 11-14-91



Photograph No. 2
Orientation: West
Description: Wastewater treatment system receiving tanks

Location: SWMU 1
Date: 11-14-91



Photograph No. 3
Orientation: West
Description: Wastewater treatment system receiving tank
(note sealed drain and fiberglass reinforced floor)

Location: SWMU 1
Date: 11-14-91



Photograph No. 4
Orientation: West
Description: Wastewater treatment system (receiving tank in background, treatment tanks in foreground)

Location: SWMU 1 and 2
Date: 11-14-91



Photograph No. 5
Orientation: North
Description: Former drum storage area

Location: SWMU 4
Date: 11-14-91

ATTACHMENT B

VISUAL SITE INSPECTION FIELD NOTES

D. A. (DON) MCGLOONE
General Manager



Administrative Offices
400 Town Center - Suite 300
Dearborn, Michigan 48126

Beeper 903-5043
(313) 336-7750
FAX (313) 336-7256



JOHN G. CHRISTOPHER

ADMINISTRATIVE OFFICE:
400 Town Center, Suite 300
Dearborn, Michigan 48126
Telephone: (313) 336-7750
Fax: (313) 336-7256

LIQUID & CHEMICAL DIVISION
3345 Greenfield Road
Melvindale, Michigan 48122
Telephone: (313) 928-6300
Fax: (313) 928-5572

TERRENCE P. CONWAY

ASSOCIATE COORDINATOR
OFFICE OF GENERAL COUNSEL
GENERAL MOTORS CORPORATION
(313) 974-1154

NEW CENTER (5th) BUILDING
3031 WEST GRAND BLVD
P.O. BOX 33122
DETROIT, MICHIGAN 48232

11-14-91

EMS

GMC Fisher Body

aka Sybil Inc.

aka S.L. Detroit Warehousing

aka NAVE, Inc.

meet at 09:16 with

NAVE Representatives:

Don McGlone, Gen. Manager

John Christopher, Treasurer

Joe Dombrowski, Chemist

PRC Environmental Mgmt, Inc.

Representatives:

Dave Phillips

Sherry Gemhofer

partly cloudy skies,
upper 70's F

11-14-91

Sung

Current Operations

• receive non-hang. waste-waters, trucked in (alot from steel mills) - with accept any non-hang wastewaters that, after treatment, can be discharged to Detroit sewer system.

• NAVE has owned part of original property since 1/7/91

• have not had 1st discharge yet, probably on 11/18/91 (will have to have ~~start~~^{some} discharge sampled before releasing to sewer)

11-14-91

Sung

113

Current Operations - cont'd

• has industrial wastewater Treatment Permit for Detroit water and sewer Dept. (DWRSD)
• when shipment is received, take 1 l sample, run fingerprint analysis, if determined treatable, will off-load.

• NOTE: NAVE, Inc. and Sybok, Inc. are individual companies, with common ownership.

Past Operations

(see pollution incident prevention plan for STMU descriptions)

11/1

11-14-91

Sms

- Power House and Incinerator functional but not operating yet, plan to become fully operational in stages (~2 yrs)
- 2 50-ton/day consumer incinerators, dust-chamber, cyclone, Wayne County permitted, 100 tons/day for 90% wood, 10% plastic
- Also, 2-heat recovery steam boilers, low-high pressure boilers operating @ 150 psi (work in concert w/ incinerators)
- No scrubbers on incinerators
- wants to set-up boilers to run on waste-oil, used to run on fuel oil

11-14-91

Sms

- GMC Fisher Body did run incinerators previously - Spill Rep tanks for 15 years.
- Initial feed to incinerator waste^{Sms} was oil, 2nd feed (afterburner) fed by natural gas.

Facility Tour 10:10

- photo 12 - off-loading area for incoming trucks - concrete-lined, ~6-inch diked area
- photo 13 - holding tank (receiving)
- photo 14 - concrete-lined, 2^o containment (fiberglass lumen to prevent severe cracking) used to be lined w/ clay; gravel

11'

11-14-91

Sms

photo 15: 2° containment for ~~the~~ sms receiving tanks (tank 2)

photo 16: drain to sump, goes back into treatment tank (#4)

photo 17: tank 1 in foreground, tank 2 in background

tanks not pressure-tested but did have ultra-some testing of thickness of walls - no inconsistencies found (tested before filled)

Full containment recently installed (finished Oct. 11, 91)

8' wall, sealed, discharge permit received Oct. 21, 91

Tanks 4 & 5 lined w/ fiber glass - removed

11-14-91

Sms

photo 18, 19, 20

Incinerator (Inside Bldg.)

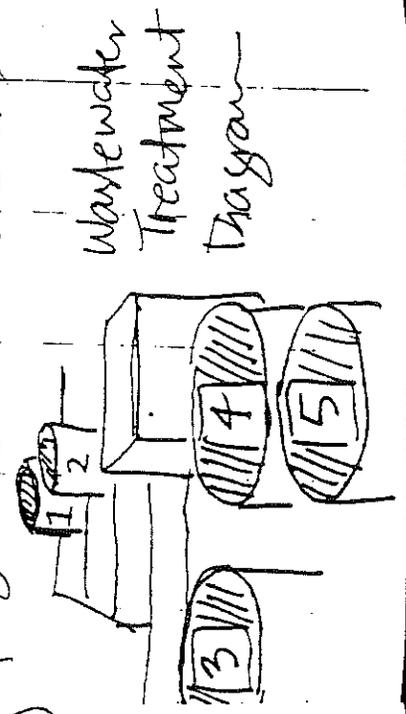
photo 21 - lower chamber of incinerator

Boiler shut-down due to CO₂ emissions, ran on No. 6 fuel oil

photo 22, 23, 24

taken from top of incinerator/power house

shows tanks 1 & 2 in background (pre-treatment) and tanks 3, 4 & 5 in foreground (treatment)



Wastewater Treatment Diagram

11-14-91

SMS

photos 25, 26, 27, 28

Panoramic view from top of boiler/incinerator remaining 2 parcels once owned by Fisher

Body Facility tour concluded at 11:00 (at Sybil part of facility)

Representatives from G.L. Warehousing were directed to meet at Warehous

Instead of laboratory. Met with Terry Conway, GM Office of General Comstock operations entered

said if we required any info from them would build 21 - Administrative to submit request in 19 minutes.

11-14-91

SMS

119

also met with Leo Phillips, rep. of current owner of remaining parcels

Facility Tour - 11-95 photo 29 - E

former storage area (products) empty now photo 30 - Bldg 31 only portion currently leased - stone particle board photo 31 - Bldg 26

walking south basement area - not much

Bible, suspected that GM Office of General Comstock operations entered there (from diagram)

photo 31 - Administrative, 1st Aide

120

11-19-91

smg

Photo 32 + Bldg #1 (vacant!)

Photo 33 - former holding tank area

Photo 39 - Bldg 10

(Vacant!)
Photo 39 - Former Driveway Storage Area (Hazard Waste Storage) Empty

Ferry Conway: (313) 974-7770/Fax

Tow concluded 13:00

~~Cherry~~

121

BRIDGET REISINGER

SENIOR ENVIRONMENTAL ENGINEER
CADILLAC MOTOR CAR DIVISION
GENERAL MOTORS CORPORATION
2000 CLARK STREET
DETROIT, MI 48232
313-554-6587
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ED JENKINS

GENERAL SUPERVISOR
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CADILLAC MOTOR CAR DIVISION
GENERAL MOTORS CORPORATION
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DETROIT, MI 48232
313-554-5716
GM 8-284-5716

-14-91 JDC

(89)

PA/USI at former GMC Fisher Body Plant - Detroit Fort Street Plant

Weather Conditions Sunny 40°F s
Arrived at the facility at 9:00AM
Conducted Pre-inspection Briefing

Participants

- John Christopher NAVE
- D.A. (Don) McGlone NAVE
- Dave Phillips PRC
- Sherry Gerunhofer PRC

Wastewater Treatment Facility Operations

Facility receives non-hazardous waste H₂O's from various industries (e.g. steel mills) any waste H₂O's that the facility can treat under their permit.

Agreed facility in Jan 7, 1991
Discharge goes to Detroit Sewer System
First discharge to occur next week
Facility has obtained pretreatment permit.

11-14-91

DF

99

Eventually, facility ^{to install a}
 filter press to dewater sludges.
 Sludges will eventually be disposed
 of at an off-site facility.

Detroit Water and Sewerage Dept. (DWSD)

- Facility requires:

- TCEP analysis
- conducts treatability analysis
- Upon receiving wastes: Facility
- conducts a fingerprint analysis

Description of Treatment System

Storage Tanks
 (Facility: Provided me with a
 Pollution Incident Response Plan)
 which contains details on tanks,
 equipment, etc.

PF

11-14-91 DG

11

Incinerators

2-50 ton/day units
 dual chamber / cyclone separators
 units are not in operation right now.

Capacity

100 tons/day waste
 Wastes - 90% wood
 Definition 10% plastic

possible start-up June 1992

2 Heat recovery boilers - also used to
 reduce emission temp.

Purchased from Flint, MI (GMC
 facilities) - GMC obtained them
 from Genesee County.

Possibly with units will be fired
 w/ waste oil - (i.e. the heat
 recovery boilers)
 Eventually, the sludge from the waste
 will be incinerated on site.

GMC operated the incinerators
 for ~5 yrs.

(92) 11-14-91 DSF

Briefing concluded at 10:10 AM

Began Visual inspection @ 10:15 AM

Trench unloading area

Cement powder - provided w/ con-
tainment walls.

Tanks 1 & 2

Removed container material used prior
to covering bottom w/ concrete
(cyan - latex concrete)

Tanks appeared to be in very
good condition

Ultrasonic testing for metal
thickness prior to filling tank.

Secondary containment areas appeared
sound.

DSF

11-14-91 DSF

(93)

Tanks 3, 4, 5 10:30 AM

Facility added secondary paving to
formerly barren areas adjacent to the
tanks. Also added ~ 12 ft concrete
leach containment walls in 1991.

Tanks appeared in good shape. Faci-
lity still constructing containment walls.

Incidents: 10:45 AM

Viewed loading / staging area of
incinerators - unit currently not
operational. Also viewed boiler
house. Both areas were not in operation.

Concluded tour of Sybil facility at
11:15 AM. Left facility at 11:17 AM

D. A. (DON) McGLONE
General Manager



Administrative Offices
400 Town Center - Suite 300
Dearborn, Michigan 48126

Beeper 903-5043
(313) 336-7750
FAX (313) 336-7256

11-14-91 JB

Building 14

Abandoned. No equipment or other machinery observed. Various bits and pieces of debris lying about.

Building 10

Abandoned. No machinery or equipment present. Two leaking fire-water lines. Floors in building appear to be in good shape.

Former Hazardous Waste Dump Station

Cement paved w/ 1ft. berming and equipped w/ canopy. No drums present. Electrical substation adjacent to former drums storage area.

Concluded VSI at 1:00PM

Left site facility at 1:45 PM

11-14-91

11-14-91 JB

Arrived at other parcel of property formerly owned by GMC Fisher body.

Met with Terry Conway FAX # (313) 74-7770
Lee Phillips

Began inspection @ 11:50 AM

- Abandoned warehouse - nothing left inside except over head cranes.

- Building 34 (or 31)

Only area that is currently being leased by company that manufactures Bar stools - facility stores various parts of the stools in this area.

Building 26:

Abandoned - No remnants of machinery or equipment.

Plotting Treatment Area inside Building 26

Abandoned - no remnants of tanks or other equipment - concrete floor appears to be in good shape.

ATTACHMENT C
REQUEST FOR INFORMATION

February 3, 1992

Ms. Michelle Fisher
Attorney
Office of General Counsel
General Motors Corporation
New Center One Building
3031 West Grand Boulevard
Detroit, MI 48232

Subject: Request for information regarding the former General Motors Corporation, Fisher Body Division, Detroit Fort Street Plant, 6307 West Fort Street, Detroit, Michigan (MID005356787)

Dear Ms. Fisher:

As you requested, I am submitting a written request for information regarding the former General Motors Corporation, Fisher Body Division, Detroit Fort Street Plant. We are missing from our files basic background information on the facility's former operations and waste management practices. Files indicate that a closure plan was submitted in lieu of a RCRA Part B permit application for the former drum storage area. Files also indicate that certification of the closure was submitted on March 2, 1985. We do not have copies of the closure plan or the certification of closure. We would appreciate your help in obtaining copies of them.

We are requesting any information that will enhance our technical understanding of the past waste flows and handling, treatment, storage, and disposal practices. This includes any information regarding past manufacturing and waste management activities and any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, or sampling data sheets that might be available.

A list of potential solid waste management units (SWMU) and areas of concern (AOC) identified during our visual site inspection (VSI) is enclosed as an attachment. Outlined in this attachment are the specific questions we need answered in order to complete our report. In addition, information we obtained during the VSI indicates that a 1,300 gallon spill of diphenyl methane diisocyanate (MDI) occurred on November 21, 1984. No specific information regarding the location, history, and cleanup of the spill has been provided. Because of the lack of information regarding the incident, we have identified the spill as an area of concern (AOC).

I understand, through conversations with Mr. David Tackman of Inland Fisher Guide and Stuart Lichter of S.L. Warehousing Detroit, Ltd., that an extensive environmental assessment was performed at the facility before the property was transferred. It would be extremely helpful if we could obtain a copy of this document.

Michelle Fisher - page 2

Your cooperation and assistance in compiling this information will help greatly to expedite our efforts. We intend to use this information to construct the most accurate description of the facility possible. I do apologize for giving you short notice; however, we understood, through conversations with David Tackman, that this information would be provided to us two months ago. Thank you for your assistance. If you have any questions about this request, please call me at (703) 883-8888.

Sincerely,

Sherry M. Gernhofer
Environmental Scientist

Attachment

cc: Paul Wooldridge, PRC
Shin Ahn, PRC
Kevin Pierard, EPA Region 5

ATTACHMENT

GMC FISHER BODY PLANT DETROIT, MICHIGAN

Name: Wastewater treatment facility receiving tanks (SWMU 1), wastewater treatment facility treatment tanks (SWMU 2), incinerators (SWMU 3), former drum storage area (SWMU 4), and diphenyl methane diisocyanate spill (AOC 1).

Regulatory Status: Identify any operational permit or permit application and cite the federal, state, or local regulations applicable to these units

Unit Characteristics: General description, including location, dimensions, SWMU or AOC components, construction material, secondary containment, and other relevant characteristics

Operational History: Dates of operation

Current Status: Active, inactive, physically closed, approved closed, or certified closed

Waste Characteristics: Description of types, volumes, and hazardous or nonhazardous characteristics of waste media

Waste Management: Description of handling, treatment, storage, and disposal practices, including names and addresses of disposal facilities used

Release History: Visual evidence or reports of releases of hazardous material, including associated dates and any regulatory actions taken

Potential Pathways: Potential migration pathways such as air, surface water, ground water, soil, or subsurface gas

Exposure Potential: Location and use of nearby water wells, surface water, and other water sources that are potential human and environmental receptors of releases

Remedial Action: Description of any remedial action undertaken as a result of past releases, including dates and types of remediation performed and disposition of waste media.

1991-11-07 08:45

002 P0



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
200 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

SHR-12

October 31, 1991

Stuart Lichter
S.L. Warehousing Detroit Limited
631 Paseo De La Playa
Redondo Beach, California 90277

Re: Visual Site Inspection
S.L. Warehousing Detroit Ltd.
(formerly GMC Fisher Body -
Fort Street Plant)
MID005356787

Dear Mr. Lichter:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

11-07 08:45

002 P07

October 31, 1991

Page 2

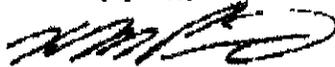
Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for November 14, 1991. The inspection team will consist of personnel of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Michigan Department of Natural Resources (DNR) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Sheri Blanchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion may be made available upon request.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

enclosure

cc: Ben Okwumabus, Michigan DNR
Dennis Drake, Michigan DNR - Lansing
Ken Burda, Michigan DNR - Lansing

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HR-12

October 29, 1991

John Christopher
Sybill Incorporated
400 Town Center, Suite 300
Dearborn, Michigan 48126

Re: Visual Site Inspection
Sybill Inc.
(formerly GMC Fisher Body -
Fort Street Plant)
MID005356787

Dear Mr. Christopher:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

October 29, 1991
Page 2

The VSI will be scheduled after your receipt of this letter. The inspection team will consist of personnel of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Michigan Department of Natural Resources (DNR) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion may be made available upon request.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

enclosure

cc: Ben Okwumabua, Michigan DNR
Dennis Drake, MDNR - Lansing
Ken Burda, MDNR - Lansing



Fisher Guide Division 6307 West Fort Street
 General Motors Corporation Detroit, Michigan 48209-2975

RECEIVED
 SEP 16 1985
 SOLID WASTE BRANCH
 U.S. EPA. REGION V

Fort Street Plant

September 10, 1985



United States Environmental Protection Agency
 Region 5
 230 South Dearborn Street
 Chicago, IL 60604

RECEIVED
 SEP 16 1985

Attention: Mr. David A. Stringham
 Chief, Solid Waste Branch

Dear Sir:

MID003356787, CTSO, PA SWB - AIS
 U.S. EPA, REGION V

Enclosed you will find a signed certification statement regarding any releases from solid waste management units at our facility.

We hope that the certified information provided will assist you in deciding favorably on our closure plan.

Should you have any questions on this and any previously provided information, please call our Environmental Contact, Mel Gilmer at (313) 554-7010.

Sincerely,

J. W. Powser
 J. W. Powser
 Plant Manager

MAG:vmf

- cc M. Gilmer
- J. Reynolds
- D. Snell
- R. Tessier
- M. Zdyb - EAS
- L. Moody - GM Legal
- J. Fannon - G. O.

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Fisher Guide Fort Street Plant
 EPA I.D. NUMBER: MID 005356787
 LOCATION CITY: 6307 West Fort Street, Detroit
 STATE: Michigan

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	<u>YES</u>	<u>NO</u>
◦ Landfill	_____	<u>X</u>
◦ Surface Impoundment	_____	<u>X</u>
◦ Land Farm	_____	<u>X</u>
◦ Waste Pile	_____	<u>X</u>
◦ Incinerator	<u>X</u>	_____
◦ Storage Tank (Above Ground)	<u>X</u>	_____
◦ Storage Tank (Underground)	<u>X</u>	_____
◦ Container Storage Area	<u>X</u>	_____
◦ Injection Wells	_____	<u>X</u>
◦ Wastewater Treatment Units	<u>X</u>	_____
◦ Transfer Stations	_____	<u>X</u>
◦ Waste Recycling Operations	_____	<u>X</u>
◦ Waste Treatment, Detoxification	_____	<u>X</u>
◦ Other _____	_____	<u>X</u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

See attachment.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

- 3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

On 11/21/84 approximately 1,300 gallons of diphenyl methane Diisocyanate (MDI) was released through a ruptured pressure gauge. All material was contained in a diked area and subsequently cleaned up.

- 4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

No continuing releases exist.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

J. W. Powser, Plant Manager
 Typed Name and Title

J. W. Powser
 Signature

9/12/85
 Date

CERTIFICATION REGARDING POTENTIAL RELEASES

FROM SOLID WASTE MANAGEMENT UNITS

Detailed Response to Item 2

Please note that the storage tanks listed, both above and below ground, do not contain stored waste, but store materials for plant use and product fabrication. All storage tanks are listed, many of which store hazardous materials, but not hazardous waste.

Storage Tanks (Above Ground)

1. Two 280,000 gallon tanks which store #6 fuel oil not classed as hazardous per RCRA (240°F flash point).
2. One 16,000 gallon tank which stores a 30 percent phosphoric acid solution considered corrosive and hazardous per RCRA.
3. One 3,600 gallon tank which stores concentrated sulfuric acid considered corrosive and hazardous per RCRA.
4. Two 300 gallon diesel fuel tanks considered hazardous per RCRA.
5. Two 6,000 gallon tanks which store diphenylmethane diisocyanate (MDI) not classed as hazardous per RCRA.
6. Two 6,000 gallon tanks which store polyether polyol not classed as hazardous per RCRA.
7. One 11,000 gallon tank which stores caustic considered corrosive and hazardous by RCRA.
8. One 1,500 gallon and four 475 gallon tanks which store concentrated nitric acid considered corrosive and hazardous per RCRA.
9. One 1,000 gallon tank which stores caustic considered corrosive and hazardous per RCRA.
10. One 1,000 gallon tank which stores a zinc chloride and polymer solution not classed as hazardous per RCRA.
11. Two 6,000 gallon tanks which store caustic considered corrosive and hazardous per RCRA.

Storage Tanks (Below Ground)

1. One 1,000 gallon tank which stores leaded gasoline considered flammable and hazardous per RCRA.
2. One 5,000 gallon tank which stores unleaded gasoline considered flammable and hazardous per RCRA.
3. One 30,000 gallon tank which stores #6 fuel oil not classed as hazardous per RCRA.

Incinerator

The December 1984 completion of our Solid Waste Disposal Resource Recovery Plant is soon to be licensed to operate under Michigan's Public Act 641 to incinerate Type O trash from other facilities as well as our own. Dual Consumat units are capable of disposing of up to 100 tons per day.

Waste disposal will be licensed for and limited to non-hazardous waste.

Container Storage Area

This is a 53.5' x 40.25' paved concrete area constructed with a 4,400 gallon sump basin for collecting any hazardous waste spillage possibilities. The entire surface is contained by a water dam and dikes.

No more than 1,040 drums can be stored at any one time.

The types of hazardous waste stored are flammable liquids, flammable solids and waste methylene chloride mixtures. No hazardous waste is stored for more than 90 days.

Wastewater Treatment Units

Two 300,000 gallon tanks and one 150,000 gallon tank serves as treatment tanks for the wastewater we discharge to Publicly Owned Treatment Works (POTW).

Daily wastewater discharged averages 208,000 gallons per day with maximum daily discharge of 400,000 gallons.

We currently have the ability to treat for pH and hexivalent chrome reduction. We plan to update our capabilities to include treatment for heavy metals, clarification and sludge removal.